

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC**

In the Matter of:

Request for Review and Waiver	)	
of the Decision of the	)	
Universal Service Administrator by	)	
	)	File No. SLD-519253
School District of Philadelphia	)	File No. SLD-517299
BEN Number: 126161	)	
	)	CC Docket No: 02-6
Schools and Libraries Universal Service	)	
Support Mechanism	)	
	)	
Wireline Competition Bureau	)	

**REQUEST FOR REVIEW**

**INTRODUCTION**

Section 54.719(c) of the Commission’s rules provides that any person aggrieved by an action taken by a division of the Universal Service Administrative Company (USAC) may seek review from the Commission.<sup>1</sup> The School District of Philadelphia (SDP) hereby appeals the current action taken by USAC in the following case.

**BACKGROUND**

**Timeline**

On December 20, 2006, SDP received notification that the SLD was denying funding for the District’s FRNs on FCC Form 471 No. 519253. The reason the SLD gave for the denial was, “Given demand, the funding cap will not provide for Internal Connections/Basic Maintenance of Internal Connections at your approved discount level to be funded. Please see [www.universalservice.org/sl/](http://www.universalservice.org/sl/).” Even though it was not included

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<sup>1</sup> 47 C.F.R. § 54.719(c).

in the SLD explanation, the District was able to determine that the requested discount rate for this application and the associated FRNs was reduced from 80% to 79%.

On February 15, 2007, SDP filed a Letter of Appeal with USAC regarding the funding discount rate reduction.<sup>2</sup> On March 8, 2007, USAC denied the District's Appeal. A copy of the Administrator's Decision on Appeal is attached as Exhibit A.

On April 13, 2007, USAC then sent SDP seven Commitment Adjustment Letters (COMAD) regarding the funding requests contained on another of the District's applications, Application No. 517299. The COMAD letters were being issued due to the fact SDP had appealed and lost regarding Application 519253. The SLD was now adjusting the District's Priority One requests contained on Application 517299. A summary of the COMAD result is as follows:

Service Provider	FRN	Previous Commitment	New Committed Amount	Difference
Nextel	1442172	\$952,743.24	\$941,534.50	\$11,208.74
Sunesys, Inc.	1442188	\$2,265,420.00	\$2,238,768.00	\$26,652.00
Telecove of Eastern Pennsylvania	1442203	\$280,500.00	\$277,200.00	\$3,300.00
US LEC COMMUNICATIONS INC.	1442281	\$730,564.80	\$721,969.92	\$8,594.88
Verizon Pennsylvania Inc.	1442214	\$1,530,000.00	\$1,512,000.00	\$18,000.00
Verizon Select Services Inc.	1442228	\$38,250.00	\$37,800.00	\$450.00
Verizon Select Services Inc.	1442258	\$189,618.00	\$187,387.20	\$2,230.80
Yipes Enterprise Services, Inc	1442290	\$510,000.00	\$504,000.00	\$6,000.00
<b>Total</b>		<b>\$6,497,096.04</b>	<b>\$6,420,659.62</b>	<b>\$76,436.42</b>

All of the COMAD reductions were for the same reason. The SLD adjusted the site discounts for Parkway Center City and Parkway Northwest to 20%. This resulted in the shared discount rate for the District decreasing from 85% to 84%. All of the above FRNs had the committed amounts adjusted to reflect a shared discount rate of 84%.<sup>3</sup>

<sup>2</sup> At the time SDP received the December 20, 2006 FCDL, the SLD was denying Priority Two requests below 80%. At the time of the filing of this FCC appeal, the SLD is denying Priority Two requests below 84%. SDP realizes that the ultimate outcome for both of the Funding Requests on Application No. 519253 is to be denied for falling below the 84% discount level. However, they are contained in this appeal since it was the denial of the appeal involving this Application that lead to the COMAD.

<sup>3</sup> A sample of the COMAD letter received by the District is Attached as Exhibit B. Even though the committed amounts vary among the FRNs, the remainder of the Funding Commitment Adjustment Explanation is the same for all of the FRNs at issue which received a COMAD letter.

## **PIA Background**

In October 2006, SDP responded to Program Integrity Assurance (PIA) questions regarding 2 of the 54 sites listed on the FCC Form 471 Block 4 for Application 519253. The two sites the PIA reviewer was questioning were Parkway Center City and Parkway Northwest. A copy of the relevant PIA question and response are attached as Exhibit C. At that time, SDP provided documentation to support the requested discount rate of 80% for each site. No further questions or requests for information regarding the provided documentation were ever received, nor were any questions received regarding the other 52 sites on the FRN.

On December 20, 2006, the District received notification that both of the Funding Requests at issue had fallen below the Priority Two threshold level and were being denied. The District then appealed the funding reduction in support of the alternative discount method the District uses to calculate their requested discount rate. A copy of the appeal is attached as Exhibit D, which shows the District could only argue in general since the District was never provided any explanation as to the discount rate reduction. When SDP received the Administrator's Decision on Appeal, for the first time, the District learned which sites the SLD had used to lower the requested discount rate. In the Administrator's Decision on Appeal there are two paragraphs that SDP specifically wishes to address at this time. Each paragraph is addressed separately below.

## **DISCUSSION**

### **Paragraph One – Department of Education Letter**

The first reason listed by USAC to uphold the SLD's reduction of the discount rate is as follows:

During the Appeal Review USAC thoroughly assessed the facts presented in the appeal letter, the relevant documentation on file, and the FCC Rules and Procedures before making its determination on your appeal. USAC agrees that Program Integrity Review (PIA) correctly determined that Parkway Center City (BEN 176004) and Parkway Northwest (BEN 2256 12) percentage discount should be 20%. During the review, PIA requested Philadelphia School District to provide documentation to support the requested 80% discount for the previously listed entities. The district's response indicated that the alternative method used to determine the 80%

discount was the Yancey Study. The documentation provided included a letter from the Department of Education stating that this method was only eligible for use up to the 2005-2006 School Year. The "Yancey Study" is not an acceptable alternative discount method for calculating the discount. On appeal, you failed to provide any evidence that USAC has erred in its initial decision. Consequently, the appeal is denied.

The first issue SDP has with the above decision is that this is the first time the District was told which sites were reduced and by how much. If the District is to effectively respond to an SLD decision, the applicant should be entitled to a complete explanation of the decision and how it was reached. Until the District received this decision, SDP was never notified by the SLD as to which sites had been reduced.

The SLD denial seems to focus on the Department of Education letter the District provided during PIA. SDP is attaching a copy of the letter, dated July 8, 2005, as Exhibit E. The PIA reviewer seems to have been confused as to the Department of Education's statement that the 2005-2006 school year would be the last year the Yancey Study would be valid.

Yet, it is the enrollment and NSLP-eligibility data from the 2005-2006 school year, specifically October 2005 that the District was required to report on its FY2006 E-rate Form 471 applications. The FCC Form 471 Instructions require an applicant to "(p)rovide the number of students eligible for NSLP as of the October 1<sup>st</sup> prior to the filing of this form, or use the most current figure available."<sup>4</sup> In the case of the District's Form 471s for FY2006, this would mean SDP was required to use the October 2005 data when providing Block 4 data on the FY2006 forms. Therefore, the letter from the Department of Education that the District provided to the PIA reviewer correctly validates the use of this data for the 2005-2006 school year.

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<sup>4</sup> See FCC Form 471 Instructions for Item 9a, Column 5, dated November 2004.

## **Paragraph Two – 20% Documentation**

The second reason stated by USAC for upholding the SLD reduction was:

You indicated on your Form 471 that your discount eligibility is 80% based upon the Yancey Study. USAC's review of your application determined that your discount eligibility percentage was not supported by the appropriate documentation. USAC modified your discount eligibility percentage to 20% using the following documentation: lowest discount available for Urban classified schools. Since you did not demonstrate in your appeal that the adjustment USAC made to your discount eligibility percentage was incorrect, USAC denies your appeal.

Yet again, the appeal filed by SDP on February 15, 2007, did not adequately address the reduction of the Parkway Center City and Parkway Northwest sites to 20% since the District was never told that these sites were reduced, or to what level. USAC is denying SDP funding for not addressing an issue that was never disclosed. If the SLD is going to reduce site discount levels, SDP would request the FCC to require the SLD to disclose that decision in full to the applicants along with an explanation of how the reduction was reached.

## **Use of Alternative Discount Method**

Per the FCC and the USAC website, the use of alternative discount mechanisms is allowed.<sup>5</sup> The District does use an alternative approach to calculate the number of NSLP-eligible students at certain school sites. This alternative approach, referred to as the “Yancey Study”, is approved by the United States Department of Agriculture for participation and eligibility in the NSLP. The Yancey Study is a comprehensive socioeconomic statistical survey and study in which District families who qualify for NSLP are identified by either (A) their inclusion on public welfare records or (B) their response to an in-person or telephone questionnaire.

This same alternative discount method has been used by SDP since they began applying for Universal Service funding. The District has provided USAC with detailed information concerning the Yancey study inclusive of an annual letter from the Department of Education validating the use of this study during each application review

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<sup>5</sup> See <http://www.universalservice.org/sl/applicants/step05/alternative-discount-mechanisms.aspx>

cycle, as well as during Selective Reviews, Site-Visits, and full compliance audits conducted by Andersen and KPMG. In all cases, the reviewers have confirmed the use and validity of this study.

In this case, the PIA reviewer was provided with a copy and explanation of the Yancey report. If the PIA reviewer had additional questions regarding the District's numbers, the reviewer never requested further documentation or clarification. Before the District's discount rate was reduced, the District should have been alerted during PIA and given a chance to substantiate their numbers. This has been the first time SDP had a reduction in the requested discount amount. As such, the District is concerned the reviewer misunderstood the discount rate calculation and should have made further inquiries before reducing the discount rate.

In subsequent conversations with USAC following the appeal denial and COMAD letters, the SLD confirmed that the issue at hand is not the methodology and validity of the Yancey Study itself but with the PA Department of Education letter authorizing the study for the 2005-2006 school year. USAC's position is that the District should have provided a similar letter validating data for the 2006-2007 school year. While the District does have correspondence further authorizing the use of this study for the 2006-2007 school year (attached as Exhibit F), it was not requested during PIA review for Funding Year 2006, and it would not have validated the October 2005 data that was used for Funding Year 2006 applications.

Simply stated, the District was required to validate data that was based upon October 2005, which they did by virtue of the letter from the PA Department of Education that was provided during PIA review.

**SLD does not provide notification of Block 4 data to Applicants**

As discussed above, SDP did not receive notification of which sites had been reduced or to what discount level, until SDP received the Administrator's Decision on the Appeal. Applicants do not receive adequate notice or guidance regarding the changes the SLD is making to the applicants forms. Applicants should receive this information in order to verify the correctness of the information and also in order to adequately address these issues on appeal.

**SUMMARY**

The School District of Philadelphia respectfully requests the FCC remand the case back to USAC with orders that the FRNs at issue be returned to the original 80% shared discount rate requested by SDP. The District would also request that the FCC order USAC to return the funding commitment decisions on Application 517299 back to the original commitment amounts and retract the COMAD letters.

Respectfully,



John D. Harrington  
Funds For Learning, LLC  
On Behalf of The School District of Philadelphia

501 South Coltrane  
Edmond, OK 73003  
405.341.4140  
[jharrington@fundsforlearning.com](mailto:jharrington@fundsforlearning.com)



**Universal Service Administrative Company**  
Schools & Libraries Division

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**Administrator's Decision on Appeal – Funding Year 2006-2007**

March 08, 2007

John D. Harrington  
Funds for Learning, LLC  
501 South Coltrane  
Edmond, OK 73003

Re: Applicant Name: PHILADELPHIA SCHOOL DISTRICT  
Billed Entity Number: 126161  
Form 471 Application Number: 519253  
Funding Request Number(s): 1443032, 1443041  
Your Correspondence Dated: February 15, 2007

After thorough review and investigation of all relevant facts, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has made its decision in regard to your appeal of USAC's Funding Year 2006 Funding Commitment Decision Letter for the Application Number indicated above. This letter explains the basis of USAC's decision. The date of this letter begins the 60 day time period for appealing this decision to the Federal Communications Commission (FCC). If your Letter of Appeal included more than one Application Number, please note that you will receive a separate letter for each application.

Funding Request Number(s): 1443032, 1443041  
Decision on Appeal: **Denied**  
Explanation:

- During the Appeal Review USAC thoroughly assessed the facts presented in the appeal letter, the relevant documentation on file, and the FCC Rules and Procedures before making its determination on your appeal. USAC agrees that Program Integrity Review (PIA) correctly determined that Parkway Center City (BEN 176004) and Parkway Northwest (BEN 225612) percentage discount should be 20%. During the review, PIA requested Philadelphia School District to provide documentation to support the requested 80% discount for the previously listed entities. The district's response indicated that the alternative method used to determine the 80% discount was the Yancey Study. The documentation provided included a letter from the Department of Education stating that this method was only eligible for use up to the 2005-2006 school year. The "Yancey Study" is not an acceptable alternative discount method for calculating the discount. On



appeal, you failed to provide any evidence that USAC has erred in its initial decision. Consequently, the appeal is denied.

- You indicated on your Form 471 that your discount eligibility is 80% based upon the Yancey Study. USAC's review of your application determined that your discount eligibility percentage was not supported by the appropriate documentation. USAC modified your discount eligibility percentage to 20% using the following documentation: lowest discount available for Urban classified schools. Since you did not demonstrate in your appeal that the adjustment USAC made to your discount eligibility percentage was incorrect, USAC denies your appeal.
- FCC Rules provide that the discount available to an applicant is determined by indicators of poverty and high cost. 47 C.F.R. sec. 54.505(b). The level of poverty is measured by the percentage of students enrolled in a school or school district who are eligible for a free or reduced price lunch under the National School Lunch Program, or a federally-approved alternative mechanism. Alternatively, the level of poverty is measured according to participation in Medicaid, Food Stamps, Supplementary Security Income (SSI), Federal Public Housing Assistance or Section 8, or Low Income Home Energy Assistance Program (LIHEAP). See Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, 12 FCC Rcd 8776, 9045, FCC 97-157 para. 510 n. 1334 (rel. May 8, 1997). The high cost determination is made pursuant to FCC Rules that classify a school or library as rural or urban. 47 C.F.R. sec. 54.505(b)(3). An applicant's discount rate is determined by reference to a matrix based upon the level of poverty and whether the entity is classified as rural or urban. 47 C.F.R. sec. 54.505(c).

If your appeal has been approved, but funding has been reduced or denied, you may appeal these decisions to either USAC or the FCC. For appeals that have been denied in full, partially approved, dismissed, or canceled, you may file an appeal with the FCC. You should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. Your appeal must be received or postmarked within 60 days of the date on this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. If you are submitting your appeal via United States Postal Service, send to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554. Further information and options for filing an appeal directly with the FCC can be found in the "Appeals Procedure" posted in the Reference Area of the SLD section of the USAC website or by contacting the Client Service Bureau. We strongly recommend that you use the electronic filing options.

We thank you for your continued support, patience and cooperation during the appeal process.

Schools and Libraries Division  
Universal Service Administrative Company

cc: Robert Westall



**Schools & Libraries Division**

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**Notification of Commitment Adjustment Letter**

**Funding Year 2006: 7/01/2006 - 6/30/2007**

April 13, 2007

**Robert Westall  
PHILADELPHIA SCHOOL DISTRICT  
440 NORTH BROAD STREET, SUITE 404  
PHILADELPHIA, PA 19130**

**Re: Form 471 Application Number: 517299  
Funding Year: 2006  
Applicant's Form Identifier: SP06-47101  
Billed Entity Number: 126161  
FCC Registration Number: 0011810272  
SPIN Name: Verizon Pennsylvania Inc.  
Service Provider Contact Person: Robert Kannegieser**

Our routine review of Schools and Libraries Program funding commitments has revealed certain applications where funds were committed in violation of program rules.

In order to be sure that no funds are used in violation of program rules, the Universal Service Administrative Company (USAC) must now adjust your overall funding commitment. The purpose of this letter is to make the adjustments to your funding commitment required by program rules, and to give you an opportunity to appeal this decision. USAC has determined the applicant is responsible for all or some of the program rule violations. Therefore, the applicant is responsible to repay all or some of the funds disbursed in error (if any).

This is NOT a bill. If recovery of disbursed funds is required, the next step in the recovery process is for USAC to issue you a Demand Payment Letter. The balance of the debt will be due within 30 days of the Demand Payment Letter. Failure to pay the debt within 30 days from the date of the Demand Payment Letter could result in interest, late payment fees, administrative charges and implementation of the "Red Light Rule." Please see the "Informational Notice to All Universal Service Fund Contributors, Beneficiaries, and Service Providers" at <http://www.universalservice.org/fund-administration/tools/latest-news.aspx#083104> for more information regarding the consequences of not paying the debt in a timely manner.

## TO APPEAL THIS DECISION:

If you wish to appeal the Commitment Adjustment Decision indicated in this letter, your appeal must be received or postmarked within 60 days of the date of this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. In your letter of appeal:

1. Include the name, address, telephone number, fax number, and e-mail address (if available) for the person who can most readily discuss this appeal with us.
2. State outright that your letter is an appeal. Identify the date of the Notification of Commitment Adjustment Letter and the Funding Request Numbers you are appealing. Your letter of appeal must include the Billed Entity Name, the Form 471 Application Number, Billed Entity Number, and FCC Registration Number (FCC RN) from the top of your letter.
3. When explaining your appeal, copy the language or text from the Notification of Commitment Adjustment Letter that is the subject of your appeal to allow the SLD to more readily understand your appeal and respond appropriately. Please keep your letter specific and brief, and provide documentation to support your appeal. Be sure to keep copies of your correspondence and documentation.
4. Provide an authorized signature on your letter of appeal.

If you are submitting your appeal electronically, please send your appeal to [appeals@sl.universalservice.org](mailto:appeals@sl.universalservice.org) using your organization's e-mail. If you are submitting your appeal on paper, please send your appeal to: Letter of Appeal, Schools and Libraries Division, Dept. 125 - Correspondence Unit, 100 South Jefferson Road, Whippany, NJ 07981. Additional options for filing an appeal can be found in the "Appeals Procedure" posted in the Appeals Area of the SLD section of the USAC web site or by contacting the Client Service Bureau at 1-888-203-8100. We strongly recommend that you use the electronic appeals options.

While we encourage you to resolve your appeal with the SLD first, you have the option of filing an appeal directly with the Federal Communications Commission (FCC). You should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. Your appeal must be received or postmarked within 60 days of the date of this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. If you are submitting your appeal via United States Postal Service, send to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554. Further information and options for filing an appeal directly with the FCC can be found in the "Appeals Procedure" posted in the Reference Area of the SLD section of the USAC web site, or by contacting the Client Service Bureau. We strongly recommend that you use the electronic filing options.

## FUNDING COMMITMENT ADJUSTMENT REPORT

On the pages following this letter, we have provided a Funding Commitment Adjustment Report (Report) for the Form 471 application cited above. The enclosed Report includes the Funding Request Number(s) from your application for which adjustments are necessary. Immediately preceding the Report, you will find a guide that defines each line of the Report.

The SLD is also sending this information to your service provider(s) for informational purposes. If USAC has determined the service provider is also responsible for any rule violation on these Funding Request Numbers, a separate letter will be sent to the service provider detailing the necessary service provider action.

Please note that if the Funds Disbursed to Date amount is less than the Adjusted Funding Commitment amount, USAC will continue to process properly filed invoices up to the Adjusted Funding Commitment amount. Please note the Funding Commitment Adjustment Explanation in the attached Report. It explains why the funding commitment is being reduced. Please ensure that any invoices that you or your service provider submit to USAC are consistent with program rules as indicated in the Funding Commitment Adjustment Explanation. If the Funds Disbursed to Date amount exceeds your Adjusted Funding Commitment amount, USAC will have to recover some or all of the disbursed funds. The Report explains the exact amount (if any) the applicant is responsible for repaying.

Schools and Libraries Division  
Universal Services Administrative Company

cc: Robert Kannegieser  
Verizon Pennsylvania Inc.

## A GUIDE TO THE FUNDING COMMITMENT ADJUSTMENT REPORT

A report for each E-rate funding request from your application for which a commitment adjustment is required is attached to this letter. We are providing the following definitions for the items in that report.

**FUNDING REQUEST NUMBER (FRN):** A Funding Request Number is assigned by the SLD to each individual request in your Form 471 once an application has been processed. This number is used to report to applicants and service providers the status of individual discount funding requests submitted on a Form 471.

**SERVICES ORDERED:** The type of service ordered from the service provider, as shown on Form 471.

**SPIN (Service Provider Identification Number):** A unique number assigned by the Universal Service Administrative Company to service providers seeking payment from the Universal Service Fund for participating in the universal service support mechanisms. A SPIN is also used to verify delivery of services and to arrange for payment.

**SERVICE PROVIDER NAME:** The legal name of the service provider.

**CONTRACT NUMBER:** The number of the contract between the applicant and the service provider. This will be present only if a contract number was provided on your Form 471.

**BILLING ACCOUNT NUMBER:** The account number that your service provider has established with you for billing purposes. This will be present only if a Billing Account Number was provided on your Form 471.

**SITE IDENTIFIER:** The Entity Number listed in Form 471, Block 5, Item 22a. This number will only be present for "site specific" FRNs.

**ORIGINAL FUNDING COMMITMENT:** This represents the original amount of funding that SLD had reserved to reimburse you for the approved discounts for this service for this funding year.

**COMMITMENT ADJUSTMENT AMOUNT:** This represents the amount of funding that SLD has rescinded because of program rule violations.

**ADJUSTED FUNDING COMMITMENT:** This represents the adjusted total amount of funding that SLD has reserved to reimburse for the approved discounts for this service for this funding year. If this amount exceeds the Funds Disbursed to Date, the SLD will continue to process properly filed invoices up to the new commitment amount.

**FUNDS DISBURSED TO DATE:** This represents the total funds that have been paid to the identified service provider for this FRN as of the date of this letter.

**FUNDS TO BE RECOVERED FROM APPLICANT:** This represents the amount of improperly disbursed funds to date as a result of rule violation(s) for which the applicant has been determined to be responsible. These improperly disbursed funds will have to be recovered from the applicant.

**FUNDING COMMITMENT ADJUSTMENT EXPLANATION:** This entry provides an explanation of the reason the adjustment was made.

**Funding Commitment Adjustment Report for  
Form 471 Application Number: 517299**

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Funding Request Number: 1442214  
Services Ordered: TELCOMM SERVICES  
SPIN: 143001398  
Service Provider Name: Verizon Pennsylvania Inc.  
Contract Number: 685/F06  
Billing Account Number: 215-019-5317  
Site Identifier: 126161  
Original Funding Commitment: \$1,530,000.00  
Commitment Adjustment Amount: \$18,000.00  
Adjusted Funding Commitment: \$1,512,000.00  
Funds Disbursed to Date: \$0.00  
Funds to be Recovered from Applicant: \$0.00

**Funding Commitment Adjustment Explanation:**

After a thorough review, it was determined that the funding commitment for this request must be reduced by \$18,000.00. On the original Form 471 the applicant was approved at an 85 percent discount. FCC rules indicate that the level of poverty shall be measured by the percentage of the student enrollment that is eligible for a free or reduced price lunch under the national school lunch program or a federally-approved alternative mechanism. During the course of an appeals review it was determined that the applicant is only eligible to receive an 84 percent discount. This determination was based on the use of the Yancey Study for Parkway Center City and Parkway Northwest to validate their discount for the funding year 2006 application. This study's eligibility expired with the 2005 funding year thus the discount for the two entities was reset to 20%. For these two entities, using 0 students eligible for a free or reduced price lunch under the national school lunch program or a federally-approved alternative mechanism resulted in the shared discount reduction. Accordingly, the commitment has been reduced by \$18,000.00 ( $\$1,800,000.00 \times (85\% - 84\%)$ ) and if recovery is required, USAC will seek recovery from the applicant.

**PLEASE SEND A COPY OF THIS PAGE WITH YOUR  
CHECK TO ENSURE TIMELY PROCESSING**

FCC Form 471  
Program Integrity Assurance Response

School District of Philadelphia  
Funding Year 2006

**Application No. 519253**

471AN: 519253  
Question No.: 2  
RE: Parkway Center and Parkway Northwest Discount Percentage  
FRN: None Specified

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**Question**

Based upon review of your Form 471 application, we were not able to validate your requested discount percentages of:

- a) PARKWAY CENTER CITY 80%
- b) PARKWAY NORTHWEST 80%

If you choose to validate your original requested discount percentages, then please provide the appropriate documentation if one of the following acceptable methods you used to calculate your discount:

a.) If the school participates in a National School Lunch Program (NSLP), please provide a signed copy (preferably by the Principal, Vice-Principal, Superintendent or chief school official, or Director of Food Services) of a Reimbursement Claim Form that the school sends to the state each month. Make sure that the following 3 items are identified:

- 1.) The Entity name
- 2.) The total number of students enrolled at the entity
- 3.) The total number of students eligible for Free/Reduced Lunch Program for the entity

If the school district fills out an aggregate claim form for the school district, also provide a signed letter from a school official (preferably the Superintendent or chief school official) that lists the enrollment and Free/Reduced information for each school in the district. The enrollment and Free/Reduced information provided in your letter should match the claim form.

b.) If the discount percentage was determined by information obtained from a survey/application (National School (Free & Reduced) Lunch Application forms cannot be used as survey instruments), please provide the following information in writing on school letterhead signed by a school official (such as the Principal, Vice Principal, Superintendent or Director of Food Services):

- 1.) Total number of students enrolled
- 2.) Total number of surveys/applications sent out
- 3.) Number of surveys/applications returned
- 4.) Total number of students qualified for NSLP per the returned surveys/applications
- 5.) Are the surveys/applications and results kept on file.
- 6.) Provide a sample copy of a FILLED OUT SURVEY/APPLICATION with the child's personal information crossed out for confidentiality.
- 7.) A signed certification that reads: "I certify that only those students who meet the Income Eligibility Guidelines of the National School Lunch Program have been included in Column 5 of Item 9a, of Block 4 of the Form 471."



c.) If the discount was determined using a different method than what was identified above, please indicate the method that was used and provide all relevant data.

**Response**

Questions concerning the Parkway schools were raised during the review of other District applications earlier this year. We attached a May 10, 2006 e-mail to Joel Salaveria and the document to which the e-mail refers to the end of our response (pages 6-31). Please let us know if you have any additional information requests concerning these two sites.

## Micah Rigdon

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**From:** Cathy Cruzan  
**Sent:** Wednesday, May 10, 2006 4:56 PM  
**To:** 'Salaveria, Joel'  
**Cc:** Philadelphia; 'Jennifer Gardner'  
**Subject:** SDP PIA Apps 517299 Response

Mr. Salaveria,

The response to PIA inquiry application 517299 is 7MB. I was concerned that due to the size of the file you might not be able to receive it as an email attachment. For convenience I have provided a link below that you can download this file from. Please reply by email so that I know that you have been able to successfully download this PIA application response. Once again thank you for your assistance and please contact me directly if you have any questions or need further documentation.

Thank you,

Cathy

[Click here](#) to download your files, or copy & paste the below link into your browser (be sure to get both lines if your e-mail client wraps the text):

<http://www.eratemanager.com/sendfile/getFiles.php?id=14&key=d80d59e27d1c2c47af775b59c71247e4>

To conserve our server space, these files will be deleted on Wednesday, May 17th, 2006 at 04:48 PM. If you need to download the files afterwards, the sender will need to re-upload the files.

Cathy Cruzan | Director of Client Operations

**Funds For Learning, LLC** | 501 S. Coltrane Road | Edmond, OK 73034

Direct 405.341.4140, x. 165 | FAX 405.341.7008

[ccruzan@fundsforlearning.com](mailto:ccruzan@fundsforlearning.com) | [www.fundsforlearning.com](http://www.fundsforlearning.com) | [www.eratemanager.com](http://www.eratemanager.com)

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**From:** Salaveria, Joel [<mailto:JSALAVE@sl.universalservice.org>]  
**Sent:** Wednesday, May 10, 2006 8:30 AM  
**To:** Cathy Cruzan  
**Cc:** Philadelphia; Jennifer Gardner  
**Subject:** RE: SDP Apps 517299 and 518215

Thank you very much.

Sincerely,

**Joel Salaveria**

Schools And Libraries Division

Program Integrity Assurance

Phone : (973) 581-5055

Fax : (973) 599-6513

e-mail address: [jsalave@sl.universalservice.org](mailto:jsalave@sl.universalservice.org)

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**From:** Cathy Cruzan [<mailto:ccruzan@fundsforlearning.com>]

10/20/2006

**Sent:** Wednesday, May 10, 2006 9:27 AM  
**To:** Salaveria, Joel  
**Cc:** Philadelphia; Jennifer Gardner  
**Subject:** RE: SDP Apps 517299 and 518215

Mr. Salaveria,

Thank you for your prompt response. I have attached the requested LOA per your request.

Kind regards,

Cathy

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**From:** Salaveria, Joel [mailto:JSALAVE@sl.universalservice.org]  
**Sent:** Wednesday, May 10, 2006 6:26 AM  
**To:** Cathy Cruzan  
**Cc:** Philadelphia  
**Subject:** RE: SDP Apps 517299 and 518215

Good morning Cathy,

I am granting your request for extension until May 17, 2006. Please also provide LOA for providing information for the district's E-rate applications. Thanks.

Sincerely,

**Joel Salaveria**  
Schools And Libraries Division  
Program Integrity Assurance  
Phone : (973) 581-5055  
Fax : (973) 599-6513  
e-mail address: jsalave@sl.universalservice.org

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**From:** Cathy Cruzan [mailto:ccruzan@fundsforlearning.com]  
**Sent:** Tuesday, May 09, 2006 4:19 PM  
**To:** Salaveria, Joel  
**Cc:** Philadelphia  
**Subject:** SDP Apps 517299 and 518215

Mr. Salaveria:

Regarding your PIA request for the School District of Philadelphia applications 517299 and 518215, we will have a response for the items on application 517299 (priority one services) ready for your review tomorrow. The District would like to formally request additional time to respond to the PIA request for application 518215 (priority two services). Please let us know if this request for additional time for application 518215 is acceptable.

Thank you for your consideration and review of the District's applications.

Cathy

Cathy Cruzan | Director of Client Operations  
**Funds For Learning, LLC** | 501 S. Coltrane Road | Edmond, OK 73034  
Direct 405.341.4140, x. 165 | FAX 405.341.7008

10/20/2006

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471AN(s): 517299 and 518215  
Question No.: B  
RE: Discount Rate Validation  
FRN: none specified

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### Question

*Based upon review of your Form 471 application, we were not able to validate your requested discount for the following schools:*

20378	FRANKLIN LEARNING CENTER	90
176004	PARKWAY CENTER CITY	80
225612	PARKWAY NORTHWEST	80

*If you choose to validate your original requested discount percentage, then please provide the appropriate documentation if one of the following acceptable methods were used:*

- c. *If the discount was determined using a different method than what was identified above, please indicate the method that was used and provide all relevant data.*

### Response

#### Franklin Learning Center

The number of students eligible for the National School Lunch Program at Franklin Learning Center is 495. The number listed on the Form 471 application is an error. The correct E-rate discount for this location is 80%.

#### Parkway Schools

The District uses an alternative, USDA-approved approach to calculate the number of NSLP-eligible students at certain school sites. This alternative, referred to as the “Yancey Study,” is described below.

### OVERVIEW OF METHODOLOGY

The District identifies families who qualify for NSLP by either (A) their inclusion on the public welfare records or (B) their response to an in-person or telephone questionnaire. Therefore, the District does not use surveys to calculate the number of students eligible for free and reduced-price lunch. The attached report describes this methodology with great specificity. (See “Philadelphia-Yancey-NSLP.pdf”)

The percentage of students eligible for free or reduced-price meals at each of the two sites in question can be found in the Yancey Study. These percentages are listed in the far-right column of the data listed at the end of the report. The table below summarizes where you can find the data needed to validate the discount request for these two sites.

BEN	Admin No.	Site Name	Name As Listed in Study	Page Number	%NSLP-Eligible Students	E-rate Disc.
176004	508	Parkway Center City	Parkway School-Center City	17	70.00%	80%
225612	507	Parkway Northwest	Parkway S G Lasalle Univ.	17	62.50%	80%

If there is additional information required concerning the methodology used to calculate the NSLP-eligibility of the District’s school sites, please feel free to contact the District.

# A Socio-Economic Study of Students Attending Philadelphia Public Schools

William L. Yancey, Ph.D.

Institute for Public Policy Studies  
Temple University

November 10, 1994

## Introduction

This report presents the findings of a two step process designed to estimate the number of Philadelphia public school students who are qualified for free or reduced price lunches. In the first step, the School District identified students who were automatically qualified for free lunches. These students were identified through computer searches of files supplied by the Pennsylvania Department of Public Welfare. If a student lived in a family that received Public Assistance, they were automatically qualified for a free lunch in Philadelphia public schools. Once the School District completed its computer match, we were presented with two critical pieces of information:

- o The number of students who automatically qualify for a free lunch - overall and for each school;
- o The names, addresses, telephone numbers and most recent school attended of those students who do not automatically qualify for free lunches.

This is a study of the students who were not matched on the welfare files. Two thousand five hundred and thirty five (2,535) students were selected through a stratified random sampling process. These students are representative of the 91,716 active non-matched (i.e., not belonging to a family on the welfare lists) students in the District. Through a combination of telephone and face-to-face interviews, information was obtained regarding the income level and household size for these students. These are the two pieces of information required to determine which students would qualify for a free lunch if they were to make an application.

Our research shows that 71% of the students attending Philadelphia's public schools are qualified for free lunches. This figure includes the:

- o 50% who were identified on the welfare roles

(i.e., automatically qualified) and

- o 42% of the non-welfare students, or 21% of the total, that were qualified for free lunches based on income and household size.

In addition 18% of the non-welfare students, or 9% of the total were qualified for reduced price lunches. Together this research indicates that 80% of the students attending Philadelphia's public schools live in low-income households.

A similar study, conducted in 1991, found that 75% of public school students were from low income families, thus in only three years there has been an 5% increase in the number of students from low income families. This increase is consistent with the changing rates of poverty in the city of Philadelphia over this period. In 1991 the Current Population Survey found 20.7 percent of households had incomes which were below the poverty level. The 1993 Current Population Survey found 26.5 percent of households with incomes below the poverty level. The increasing rate of poverty is also reflected in the number of AFDC cases in Philadelphia. The state welfare department reports that AFDC cases increased from 144,828 cases in 1990-91, to 169,060 cases in 1993-94.

What follows is a detailed description of the procedures we followed to generate these estimates. First, we present a description of the sample design. Next, we describe the questionnaire and method of data collection. Included is a discussion of the potential bias resulting from interviews that were not completed, and a comparison of results obtained from telephone and field interviews. Estimates of the percent of non-welfare students qualified for free and reduced price and confidence intervals for these estimates lunches are provided. The appendix lists the 265 schools included in this research and shows the percent of students who were matched on the welfare files, and the estimates of the percent who were qualified for free and reduced price lunches.

### Sample Design

A cursory examination of the data describing the percent of school's non-welfare students that were qualified for free or reduced price lunches, and the percent of students who received welfare, revealed that schools with a larger proportion of welfare students tended to have a higher proportion of non-welfare students who were qualified for free or reduced lunches. This finding strongly indicated that:

More precise estimates of the percent of non-welfare students qualified for free or reduced price lunches could be obtained if, for sampling purposes, schools were stratified - or divided - by the proportion of student/households receiving welfare.

All active non-welfare students were placed in one of eight groups based on the school they were most recently attending. Schools were divided into strata according to the proportion of the school's students who were matched by the welfare files. Then a pre-determined number of students/households were randomly selected from within each of the strata, regardless of grade or school.

The sample was designed to produce a sufficient number of interviews to make accurate estimates of the percent of students qualified for free and reduced price lunches for each strata. The accuracy of these estimates rests on the relative size of strata and the expected proportion of students who are qualified for participation in categorical programs. Experience tells us to expect some incorrect telephone numbers and addresses, as well as refusals to participate. Therefore the initial sample of student/households was larger than the required number of completed interviews.

Table 1 provides the basic information as to the number of schools, number of students, and number of students drawn in each strata. The sample represented approximately 4% - or one-in-twenty-five - of the total eligible students. In strata 8 (over 80% welfare match) the percent of eligible students who were sampled is significantly higher (67%). This is because the total number of non-welfare students in this strata is small and in order to get a sufficient number of interviews, we had to oversample. For the analysis, interviews have been weighted by the inverse of the probability of their selection.

Table 1: Schools, Study Population (Non-Welfare Students) and Sample Size by Strata

Strata	Percent Welfare Match	Schools	Non-Welfare Student Population	Sample
1	0-19	18	14626	279
2	20-29	30	14384	315
3	30-39	29	12197	442
4	40-49	36	17341	468
5	50-59	30	9633	549
6	60-69	60	15218	515
7	70-79	51	7445	523
8	80-100	11	872	586
Total		265	91716	3677



### The Questionnaire:

The questionnaire was short. It was designed to obtain only that information necessary to classify households into one of three categories:

- o qualified for free lunch;
- o qualified for reduced priced lunch;
- o required to pay full price for lunch.

We placed students into these categories based on the USDA's 1993-94 guidelines regarding household size and income.

The questionnaire began with a series of questions which verified that the household was the primary residence and person being interviewed was guardian or parent of the student selected in the sample. This was followed by questions on how the student traveled to school and what the student did regarding lunch (i.e., did they bring a lunch from home, eat in school cafeteria, or buy lunch near school?).

These "warm-up" questions were followed by questions that addressed the number of children and adults living in the household. We asked if the student was a foster child, thereby automatically qualifying for free lunches. We also asked whether they received welfare and/or food stamps. Should the computer matching fail to identify all student-households receiving food stamps or welfare, positive answers to these questions meant the student was automatically qualified for free lunches.

Respondents were then asked a series of questions about their various sources of income. In order to insure maximum participation with this questionnaire, we asked how it was easiest for respondents to answer income questions (i.e. by the year, month or week).

Given the general sensitivity to questions concerning income, we chose not to ask direct questions as to the actual amount of income. For a given household size and payment period (yearly, monthly, or weekly), the interviewer guided by a Computer Assisted Telephone Interviewing system (CATI) asked whether or not household income was above or below the amount specified for reduced lunches, (i.e. 185% of the federal poverty level). Those whose income exceeded the 185% of federal poverty were then asked if their income was above or below the amount equivalent to 200% of the poverty level.

If the respondent's income was below 185% of the poverty level, they were asked if their income was below the amount specified for free lunches (135% of the poverty level). Those who qualified for free lunch were also asked if their income was below an amount equal to the poverty level. This procedure

satisfied the basic objectives of this study and we believe was one of the factors that contributed to the relatively few interviews broken off before critical income information was obtained.

#### Data Collection:

In order to increase the level of cooperation with this study, the Superintendent of the District sent a letter to the parents of students included in the sample. The letter requested the parent's cooperation in the research and assured them that their answers would be confidential.

Interviews were conducted by Chilton Research Services using a mixed telephone and personal interview methodology. Interviewing was conducted by professional interviewers trained and supervised by Chilton Research Services using a CATI system. Both telephone and face-to-face interviews were edited for legibility, completeness, consistency, logic, accuracy, and validity.

Telephone or personal interviews were conducted in Spanish as the need arose. Facilities for interviewing in other foreign languages were not available.

The data collection took place during the months of May, June, July and August of 1994. There were two phases of data collection. First, all initial contacts were attempted by telephone. When a telephone number was incorrect or not available, directory assistance was contacted to obtain a current number. At least five attempts or "call-backs" were made for each household.

During this initial phase of data collection there were some student households whose address and/or phone number were incorrect. These incorrect addresses and/or telephone numbers were over-represented among students attending schools with high percentages of welfare-matched students. The names of these students were given to the appropriate principals for a corrected address and phone number. This effort, concentrated in schools in the poorer strata, resulted in an additional 59 telephone interviews that would have otherwise been sent to field interviewers. Across all strata, telephone interviewing produced 2,127 interviews.

The second phase of data collection took place between July 8 and August 4. Households, who had not been contacted and interviewed by telephone, were given to field interviewers for a face-to-face interviews in the home. Up to three attempts were made to contact each household. Across all strata 333 face-to-face interviews were completed.

The sample included 75 students who had a sibling who was also included in the sample. If we had eliminated these "duplicates" from the study we would have under represented large families. Rather than conduct a second interview, information regarding family size and income was duplicated and these sibling-students included in the analysis.

The number of sampled households and the number of interviews that were completed are presented in Table 2. Telephone interviews are over-represented among the strata with fewer welfare students. Field interviews are more heavily concentrated among students attending schools with higher proportions of welfare students. This pattern of data collection was anticipated given the commonly accepted relationship between economic status and: (1) the accuracy of school records and (2) telephone availability in the home.

Table 2: Sample Size, Completed Interviews  
Total, Telephone and Field by Strata

Strata	1	2	3	4	5	6	7	8	Total
Sample	279	315	442	468	549	515	523	586	3677
<u>Interviews Completed</u>									
Telephone	184	215	291	285	313	290	286	263	2127
Field	19	19	32	38	37	62	56	70	333
Total	203	234	323	323	350	352	342	333	2460
Pct Field	9.4	8.1	9.9	11.8	10.6	17.6	16.4	21.0	13.5
Duplicates	2	3	6	4	9	4	9	38	75
<u>Total Students Represented</u>									
by Survey	205	237	329	327	359	356	351	371	2535

#### Non-Responses:

Interviews were completed for 69% of the households sampled. In spite of this high completion rate, the remaining 31% are non-responses and represent potential bias in this research.

There are many reasons why the parents of students, drawn from the District's records of active students might not have been interviewed. A few parents refused to answer critical questions about income. Some parents spoke neither English or Spanish. Telephone numbers and addresses were incorrect. In some cases the interviewers judged the residential areas so dangerous that they refused to enter. One interviewer was mugged.

We have classified the non-responses into four groups. First are the "Refusals." This group consists of households that were contacted but the respondent refused to participate in the study, broke off the interview before answering questions concerning income, or continued to insist that we "call-back" at a more convenient time. Nine percent of the sample (342 cases) refused to participate.

Second are those who spoke neither English or Spanish. Apparently most of these respondents were recent Asian immigrants. Less than two percent of the sample (65 cases) were lost because of a language barrier.

Third are households that were apparently correctly identified but, in spite of five attempts, contact was never made. No one answered the phone, an answering machine was always on, the phone was always busy, or no one answered the door. We were unable to contact, either by phone or in person, eleven percent of the sample (390 cases).

Finally, there were the relative large number of student-households (345) that contained incorrect telephone numbers and addresses. Some houses were vacant, some addresses did not exist; families or students had moved.

The potential bias resulting from these non-responses may be evaluated by comparing the distributions of the reasons for non-responses across the eight sampling strata to the distribution of the sample. The number of non-responses for each of these four sources, by sampling strata, are given in Table 3. We have also calculated the non-response rates, both total and for each of the four sources, across the eight sampling strata. The rates are the percent of the sample that did not result in a completed interview.

Table 3: Interviews and Non-Responses by Strata

Strata	Sample and Completed Interviews								Total
	1	2	3	4	5	6	7	8	
Sample	279	315	442	468	549	515	523	586	3677
Interviews	203	234	323	323	350	352	342	333	2460
Duplicates	2	3	6	4	9	4	9	38	75
Total Students Represented	205	237	329	327	359	356	351	371	2535
	Number of Uncompleted Interviews by Reason								Total
	1	2	3	4	5	6	7	8	
Total Incompletes	74	78	113	141	190	159	172	215	1142
Refusals	31	30	44	37	65	48	39	48	342
Language Barrier	7	16	8	12	11	8	2	1	65
No Contact Made	26	19	36	55	59	58	64	73	390
Incorrect Information	10	13	25	37	55	45	67	93	345

Table 3: continued

Strata	Rates of Uncompleted Interviews								Total
	1	2	3	4	5	6	7	8	
Total Incomplete	26.5	24.8	25.6	30.1	34.6	30.9	32.9	36.7	31.1
Refusals	11.1	9.5	10.0	7.9	11.8	9.3	7.5	8.2	9.3
Language Barrier	2.5	5.1	1.8	2.6	2.0	1.6	0.4	0.2	1.8
No Contact Made	9.3	6.0	8.1	11.8	10.7	11.3	12.2	12.5	10.6
Incorrect Information	3.6	4.1	5.7	7.9	10.0	8.7	12.8	15.9	9.4

Examination of these distributions indicates that the first two types of non-responses are either few in number or are not heavily skewed in one direction or the other. The rates which respondents refused to participate is similar (9% to 12%) across all strata. There appears to be slight tendency for refusals to occur more often in strata with the lowest rates of welfare. Language barriers, although rare, occurred in all strata. A language barrier was most frequently encountered with students attending schools with the lowest proportion of welfare families.

The rate of non-response resulting from our inability to contact the household and from incorrect information is highest among those strata with the higher proportions of welfare families. If the general pattern observed across strata, indicating that incorrect information is more characteristic of students attending schools with high proportions of students receiving welfare is also true within stratum, then this study may under-represent the poorest children.

One way to explore this issue is to compare the results that were obtained from telephone interviews with the results of face-to-face interviews. The telephone interviews were completed with households with correct telephone numbers and/or addresses in the District's files. The field interviews consisted of households that we were unable to contact by telephone.

We have already noted that the face-to-face interviews were more heavily concentrated in the poorer strata. Thus it is expected that face-to-face interviews produce a higher proportion of students that were qualified for free lunches (45.5%) than did telephone interviews (26.7%). This tendency is also found within sampling strata.

Table 4 presents the proportions of students who were qualified for free lunches by whether the interview was interviewed by telephone or in person. Face-to-face interviews took place because of our inability to contact the household by telephone. Not only are these more likely to have occurred among the poorer strata, but within each strata, face-to-face interviews are more likely to occur for students who are qualified for free lunches. Stated differently, if there is a

bias in this study resulting from non-responses due to inadequate or incorrect information, it is likely that we have under-represented the percent of students that are qualified for free lunches. These results also indicate that had we relied on telephone interviewing alone, this under-estimation would have presented a severe flaw in our inquiry.

Table 4: Percent of Students Qualified by  
for Free Lunch by Interviewing Method  
and Sampling Strata

Strata	Face-to-Face	Telephone
1	47.4	18.3
2	52.6	28.9
3	64.5	29.4
4	78.9	41.7
5	81.1	45.7
6	69.8	51.5
7	83.9	64.7
8	92.2	75.7
Total	76.8	46.4

#### Results:

Student/households were placed in one of six categories reflecting their qualification for free or reduced priced lunches. These were foster children, those living in households receiving welfare or food stamps, who automatically qualify for free lunches, and three categories of income relative to the poverty level--less than 135%, between 135% and 185 percent, and above 185% of poverty. Table 5, presents the percent of student/households falling into each of these groups by strata.

Table 5: Percent of Households with Foster  
Children, Receiving Welfare, Food Stamps, and  
Income Relative to Poverty of Other Households

Percent Welfare Strata	Foster Children	Welfare	Food Stamps Only	Household Income Relative to Poverty		
				below 135%	135%- 185%	above 185%
1t 20%	.0	7.3	.5	13.2	15.6	63.4
20-29%	.0	5.9	5.1	19.8	17.7	51.5
30-39%	.3	7.6	3.4	21.4	21.7	45.6
40-49%	.3	13.4	5.8	26.5	18.6	35.4
50-59%	1.1	13.9	8.6	25.6	18.4	32.3
60-69%	1.7	19.5	8.5	25.1	19.2	26.0
70-79%	1.4	29.1	11.7	25.6	14.5	17.7
80-100%	1.3	33.2	19.6	24.9	11.8	9.1
Total	.6	13.0	5.9	22.3	18.1	40.2

The estimated percent of non-welfare-matched students qualified for free lunches is the sum of the first four columns of Table 5: Foster, Welfare, Food Stamps and those below 135% of the poverty level. The percent qualified for reduced price lunch are those whose household income is between 135% and 185% of the poverty level.

Table 6 presents the percent of students who were not matched with the welfare files who were qualified for free and reduced price lunches for each strata. As can be seen, the percent of non-welfare students qualified for free and reduced price lunches is directly related to the percent of students whose families were identified on the welfare roles. Thus among the 14,626 children attending the eighteen schools with less than 20% of their students on welfare, twenty-one percent of the non-welfare-matched students are qualified for free lunches. By way of contrast, among the 872 students attending the eleven schools where over eighty percent of students received welfare, seventy-nine percent of those not found in the welfare files qualified for free lunches.

Table 6: Percent of Non-Welfare Students  
Qualified for Free and Reduced Price Lunches  
by Strata

Strata	Schools	Non-Welfare Students	Free	Reduced	Other
1t 20%	18	14626	21.0	15.6	63.4
20-29%	30	14384	30.8	17.7	51.5
30-39%	29	12197	32.7	21.7	45.6
40-49%	36	17341	46.0	18.6	35.4
50-59%	30	9633	49.3	18.4	32.3
60-69%	60	15218	54.8	19.2	26.0
70-79%	51	7445	67.8	14.5	17.7
80-100%	11	872	79.1	11.8	9.1
Total	265	91716	41.8	18.1	40.2

Table 7 presents estimates of the percent of all students qualified for free and reduced price lunches. This is calculated by combining the estimates of the percent of non-welfare students who are qualified for free or reduced price lunches, with the results of the computer matches of students and welfare files. The computer match indicates the number of students who are qualified for free lunches. By multiplying the number of students, who were not matched on the welfare files, by the percentages shown in Table 6, estimates of the number of these students who qualified for free or reduced price lunches are generated.

For example, 82.5% of the 4,916 students attending the 11 schools in the 80% to 100% welfare strata received welfare. In addition, seventy-nine percent of the 872 non-welfare matched students attending these schools, or fourteen percent of the total, also qualified for free lunches because they were foster children, received welfare or food stamps or lived in households with incomes below 135% of the poverty level. Thus 96% of the students in this strata were qualified for free lunches. There were also 12% of the non-welfare students attending these schools, or 2% of the total, who qualified for reduced price lunches because they lived in households with incomes between 135% and 185% of the poverty level.

Table 7: Estimates of the Percent of Students Qualified for Free and Reduced Price Lunches by Strata

Percent Welfare Strata	Number of Schools	Percent Welfare Matched	Non-Matched Free	Total Free	Non-Welfare Reduced
1 - 20%	18	15.8	17.7	33.5	13.1
20 - 29%	30	25.4	23.0	48.4	13.2
30 - 39%	29	34.2	21.5	55.7	14.3
40 - 49%	36	45.4	25.1	70.5	10.2
50 - 59%	30	55.1	22.2	77.2	8.3
60 - 69%	60	64.5	19.4	84.0	6.8
70 - 79%	51	74.1	17.5	91.7	3.8
80 - 89%	11	82.5	13.9	96.3	2.1
TOTAL	265	50.4	20.7	71.1	9.0

#### Calculation of Standard Error and Confidence Intervals:

As we have generated sixteen (16) estimates of the proportion of students who are qualified for free and reduced price meals we have calculated 16 standard errors and confidence intervals. This is done using the equation:

$$\text{Standard Error} = \sqrt{(p * q / n)}$$

Where:

p = the proportion of students qualified for free (or reduced price) lunch

q = the proportion which are not qualified

n = the size of the sample for each strata.

One half of the 95% confidence interval is obtained by multiplying the standard error by 1.96. The results are given in the Table 8. For the first strata, the proportion of students qualified for free lunches is 21 percent with a 95% confidence



interval of  $\pm 5.6\%$ . This means that if this research were replicated 100 times, 95-out-of-100 times the estimate of the percent of non-welfare students in the first strata qualified for free lunch would be between 15.4% and 28.6%.

Table 8: Standard Errors and Confidence Intervals by Strata

Welfare Strata	Estimated Free	Standard Error	Half of Conf Int	Estimated Reduced	Standard Error	Half of Conf Int	Sample Size
-20	21.0	2.8	5.6	15.6	2.5	5.0	205
20 - 29	30.8	3.0	5.9	17.7	2.5	4.9	237
30 - 39	32.7	2.6	5.1	21.7	2.3	4.5	329
40 - 49	46.0	2.8	5.4	18.6	2.2	4.2	327
50 - 59	49.3	2.6	5.2	18.4	2.0	4.0	359
60 - 69	54.8	2.6	5.2	19.2	2.1	4.1	356
70 - 79	67.8	2.5	4.9	14.5	1.9	3.7	351
80 -100	79.1	2.1	4.1	11.8	1.7	3.3	371

These confidence intervals appear to be relatively large, especially in the case of the lower strata where the 95% confidence interval is above  $\pm 5\%$  percent.

It will be remembered that the study population of this research is only those students who were not matched on the welfare files. When we take this into consideration, and ask the question of the size of the confidence intervals relative to the total enrollments, a somewhat different conclusion is suggested concerning the accuracy of these estimates. For example, in the highest strata 83% of students were excluded from the study because they were matched on the public assistance files. This research indicates that 79% of the non-welfare students in this strata, or 14% of the total, are qualified for free lunches. Similarly, the confidence interval is  $\pm 4.1\%$  of eighteen percent. Thus the confidence interval for the highest strata is less than 1% of the total students in these schools.

We have repeated this calculation for all strata. The results are given in Table 9. As expected, the adjustments of confidence intervals are directly related to the proportion of all students covered by the study. The reduction in the size of the confidence interval is greatest among those strata where there were relatively few students whose families were not receiving public assistance.

Table 9: Adjusted Confidence Intervals

% Welfare Strata	Percent Welfare Matched	Percent Not Matched on Welfare	One-half of Adjusted Confidence Intervals	
			Free	Reduced
-20	15.8	84.2	4.7	4.2
20 - 29	25.4	74.6	4.4	3.6
30 - 39	34.2	65.8	3.3	2.9
40 - 49	45.4	54.6	3.0	2.3
50 - 59	55.1	44.9	2.3	1.8
60 - 69	64.5	35.5	1.8	1.5
70 - 79	74.1	25.9	1.3	1.0
80-100	82.5	17.5	0.7	0.6

NUMBER	SCHOOL NAME	TOTAL STUDENTS	% WELFARE MATCHED	ESTIMATED FREE	ESTIMATED REDUCED	TOTAL % LOW INC.
101	BARTRAM, JOHN HIGH SCHOOL	1800	42.8	26.3	10.6	79.8
102	WEST PHILADELPHIA HIGH SC	1561	49.3	23.4	9.4	82.1
108	UNIVERSITY CITY HIGH SCHO	1852	53.6	22.9	8.5	85.0
110	SAYRE, WILLIAM L. MIDDLE	1093	57.2	21.1	7.9	86.2
111	SHAW, ANNA H. MIDDLE	742	62.3	20.7	7.2	90.2
112	SULZBERGER, MAYER MIDDLE	900	67.2	18.0	6.3	91.5
113	TILDEN MIDDLE SCHOOL	851	64.3	19.6	6.9	90.7
115	PEPPER, GEORGE MIDDLE SCH	845	49.5	23.3	9.4	82.1
116	TURNER, JOHN P. MIDDLE SC	1023	50.2	24.5	9.1	83.9
120	BARRY, COMM. JOHN SCHOOL	705	65.0	19.2	6.7	90.9
121	BELMONT SCHOOL	407	74.7	17.2	3.7	95.5
123	BRYANT, WILLIAM C. SCHOOL	644	59.2	20.1	7.5	86.8
125	CATHARINE, JOSEPH SCHOOL	491	62.3	20.6	7.2	90.2
126	COMEGYS, BENJAMIN B. SCHO	608	68.4	17.3	6.1	91.8
127	DREW, CHARLES R. SCHOOL	571	61.8	20.9	7.3	90.1
129	HAMILTON, ANDREW SCHOOL	831	44.3	25.6	10.4	80.3
130	HARRINGTON, AVERY D. SCHO	597	64.8	19.3	6.8	90.9
131	HARRITY, WILLIAM F. SCHO	480	55.4	22.0	8.2	85.6
133	HUEY, SAMUEL B. SCHOOL	808	65.3	19.0	6.7	91.0
134	LEA, HENRY C.	974	60.6	21.6	7.6	89.8
135	LONGSTRETH, WILLIAM C. SC	754	65.0	19.2	6.7	90.9
136	MC MICHAEL, MORTON SCHOOL	676	70.9	19.8	4.2	94.9
137	MITCHELL, S. WEIR SCHOOL	740	64.9	19.3	6.7	90.9
138	MORTON, THOMAS G. SCHOOL	508	64.8	19.3	6.8	90.8
139	POWEL, SAMUEL SCHOOL	233	24.9	23.1	13.3	61.3
140	PATTERSON, JOHN M. SCHOOL	650	53.7	22.8	8.5	85.0
141	RHOADS SCHOOL	613	72.6	18.6	4.0	95.2
142	WASHINGTON, MARTHA SCHOOL	625	75.5	16.6	3.6	95.7
143	WILSON, ALEXANDER SCHOOL	227	66.5	18.3	6.4	91.3
144	PENROSE SCHOOL	440	45.7	25.0	10.1	80.8
145	MILLER, E. SPENCER	195	60.0	21.9	7.7	89.6
146	ANDERSON, ADD B. SCHOOL	512	48.6	23.6	9.6	81.8
147	LOCKE, ALAIN SCHOOL	403	79.2	14.1	3.0	96.3
149	BLANKENBURG, RUDOLPH SCHO	368	64.4	19.5	6.8	90.7
150	BARTRAM, JOHN-FRESHMAN CE	243	43.6	26.0	10.5	80.1
153	LEIDY SCHOOL	377	70.6	20.0	4.3	94.8

NUMBER	SCHOOL NAME	TOTAL STUDENTS	% WELFARE MATCHED	ESTIMATED FREE	ESTIMATED REDUCED	TOTAL % LOW INC
157	BARTRAM, JOHN-MOTIVATION	264	24.6	23.2	13.4	61.2
158	MIDDLE YEARS ALTERNATIVE (	268	35.1	21.2	14.1	70.4
199	CATTO-BARTRAM, JOHN HIGH	272	39.3	19.8	13.2	72.4
200	SOUTH PHILADELPHIA HIGH S	1216	50.2	24.6	9.2	83.9
201	FRANKLIN BENJAMIN HIGH SC	1420	61.2	21.3	7.5	89.9
202	CREATIVE AND PERFORMING A	605	21.8	24.1	13.9	59.8
209	BOK, EDWARD HIGH SCHOOL	929	48.1	23.9	9.6	81.7
210	AUDENRIED, CHARLES HIGH S	655	63.1	20.2	7.1	90.4
211	BARRATT, NORRIS S MIDDLE	950	70.9	19.7	4.2	94.9
212	VARE, EDWIN H. MIDDLE SCH	967	63.8	19.8	7.0	90.6
213	VAUX, ROBERTS MIDDLE	915	78.1	14.8	3.2	96.1
214	MASTERMAN, JULIA R. SR. H	288	11.5	18.6	13.8	43.9
215	THOMAS, GEORGE C. MIDDLE	541	53.2	23.1	8.6	84.9
216	FURNESS, HORACE HIGH SCHO	995	45.8	24.9	10.1	80.8
219	FELL, D. NEWLIN SCHOOL	439	50.8	24.3	9.0	84.1
220	ALCORN, JAMES SCHOOL	576	86.3	10.8	1.6	98.7
221	BACHE-MARTIN SCHOOL	731	43.2	26.1	10.6	79.9
222	MASTERMAN, JULIA R.	781	14.1	18.0	13.4	45.5
224	BREGY, F. AMEDEE SCHOOL	543	61.0	21.4	7.5	89.9
226	CHILDS, GEORGE W. SCHOOL	535	77.4	15.3	3.3	96.0
229	FRANKLIN LEARNING CENTER	892	38.7	20.1	13.3	72.1
230	DURHAM, THOMAS CHILD DEV.	226	39.4	19.8	13.2	72.4
231	BOONE, DANIEL SCHOOL	174	68.4	17.3	6.1	91.8
232	GIRARD, STEPHEN SCHOOL	1078	45.9	24.9	10.1	80.9
234	MC CALL, GEN. GEORGE A. S	593	25.6	22.9	13.2	61.7
237	MC DANIEL, DELAPLAINE SCH	630	71.6	19.3	4.1	95.0
238	MEREDITH, WILLIAM M. SCHO	526	26.6	22.6	13.0	62.2
239	MORRIS, ROBERT SCHOOL	530	77.4	15.4	3.3	96.0
240	PEIRCE, WILLIAM S. SCHOOL	646	70.9	19.7	4.2	94.9
242	REYNOLDS, GEN. JOHN F. SC	456	80.0	15.8	2.4	98.2
243	PALUMBO, FRANK SCHOOL	285	84.2	12.5	1.9	98.6
244	SMITH, WALTER G. SCHOOL	621	71.5	19.3	4.1	95.0
245	STANTON, EDWIN M. SCHOOL	237	76.4	16.0	3.4	95.8
247	GREENFIELD, ALBERT M. SCH	772	21.2	24.3	14.0	59.5
248	ARTHUR, CHESTER A. SCHOOL	310	75.2	16.8	3.6	95.6

NUMBER	SCHOOL NAME	TOTAL REVENUE	% RELEASE	ESTIMATED SALES	ESTIMATED EXPENSES	TOTAL % LOADING
249	WARING, LAURA W. SCHOOL	276	79.3	14.0	3.0	96.4
251	JACKSON, ANDREW SCHOOL	308	63.0	20.3	7.1	90.4
252	JENKS, ABRAHAM SCHOOL	208	42.3	26.6	10.7	79.6
254	KEY, FRANCIS SCOTT SCHOOL	460	67.6	17.8	6.2	91.6
258	KIRKBRIDE, ELIZA B. SCHOOL	555	66.8	18.2	6.4	91.4
259	NEBINGER, GEORGE W. SCHOOL	298	65.4	18.9	6.6	91.0
263	SHARSWOOD, GEORGE SCHOOL	378	46.3	24.7	10.0	81.0
264	SOUTHWARK SCHOOL	794	68.5	17.3	6.0	91.8
269	TAGGART, JOHN H. SCHOOL	561	57.9	20.7	7.7	86.4
272	VARE, ABIGAIL SCHOOL	566	68.6	17.2	6.0	91.8
273	WASHINGTON, GEORGE SCHOOL	369	73.2	18.2	3.9	95.3
401	GRATZ, SIMON HIGH SCHOOL	1813	59.8	19.8	7.4	87.0
402	OVERBROOK HIGH SCHOOL	2412	41.0	27.2	11.0	79.1
403	CARVER HIGH SCHOOL	661	17.4	17.3	12.9	47.6
406	DOBBS, MURRELL HIGH SCH	1807	46.2	24.8	10.0	81.0
410	BEEBER, DIMNER MIDDLE	1165	40.6	27.3	11.0	79.0
411	FITZSIMONS, THOMAS MIDDLE	877	70.2	20.2	4.3	94.7
412	GILLESPIE, ELIZABETH MIDDLE	1145	65.1	19.1	6.7	90.9
413	SHOEMAKER, WILLIAM H. MID	784	59.1	20.2	7.5	86.8
414	STRAWBERRY MANSION HIGH S	1767	66.6	18.3	6.4	91.3
415	RHODES, E. WASHINGTON MID	1087	63.3	20.1	7.1	90.5
421	DAROFF, SAMUEL SCHOOL	734	65.1	19.1	6.7	90.9
422	BLAINE, JAMES G. SCHOOL	470	70.9	19.8	4.2	94.9
424	CASSIDY, LEWIS C. SCHOOL	669	45.3	25.2	10.2	80.7
426	CLEVELAND, GROVER SCHOOL	738	64.9	19.2	6.7	90.9
427	DICK, WILLIAM SCHOOL	312	81.4	14.7	2.2	98.3
428	GOMPERS, SAMUEL SCHOOL	416	31.7	22.3	14.8	68.9
429	BLUFORD, G. S.	847	58.4	20.5	7.6	86.6
430	HESTON, EDWARD SCHOOL	596	69.3	16.8	5.9	92.0
431	KENDERTON SCHOOL	462	68.4	17.3	6.1	91.8
432	LAMBERTON, ROBERT E. SCH	1156	22.9	23.7	13.7	60.3
434	MANN, WILLIAM B. SCHOOL	553	48.5	23.7	9.6	81.8
437	PHILADELPHIA REGIONAL HS	220	37.3	20.5	13.6	71.4
438	PEIRCE, THOMAS M. SCHOOL	510	65.9	18.7	6.6	91.1
439	PRATT, ANNA B. SCHOOL	407	77.6	15.2	3.2	96.1

NUMBER	SCHOOL NAME	TOTAL STUDENTS	% WELFARE MATCHED	ESTIMATED FREE	ESTIMATED REDUCED	TOTAL % LOW INC
440	STANTON, M. HALL SCHOOL	647	76.8	15.7	3.4	95.9
442	WALTON, RUDOLPH S. SCHOOL	368	77.2	15.5	3.3	96.0
443	WHITTIER, JOHN G. SCHOOL	603	67.7	17.7	6.2	91.6
444	ALLEN, DR. ETHEL SCHOOL	499	70.3	20.1	4.3	94.8
445	HILL, LESLIE P. SCHOOL	509	69.7	16.6	5.8	92.1
446	DUCKREY, TANNER SCHOOL	568	75.4	16.7	3.6	95.6
447	WRIGHT, RICHARD R. SCHOOL	366	74.9	17.0	3.7	95.6
448	OVERBROOK EDUCATIONAL CEN	326	17.8	17.2	12.8	47.9
451	DOUGLASS, FREDERICK SCHOO	603	76.6	15.9	3.4	95.9
453	GIDEON, EDWARD SCHOOL	375	75.7	16.5	3.5	95.7
456	KELLEY, WILLIAM D. SCHOOL	420	75.0	17.0	3.6	95.6
457	MEADE, GEN. GEORGE C. SCH	624	82.4	13.9	2.1	98.4
501	KENSINGTON HIGH SCHOOL	994	60.5	21.7	7.6	89.7
502	EDISON, THOMAS A. HIGH SC	2244	61.8	21.0	7.3	90.1
504	PENN HIGH, WILLIAM	1695	62.7	20.5	7.2	90.3
506	MASTBAUM, JULES E. HIGH S	1393	45.9	24.9	10.1	80.9
507	PARKWAY S G LASALLE UNIV.	173	27.2	22.4	12.9	62.5
508	PARKWAY SCHOOL -CENTER CI	226	34.1	21.6	14.3	70.0
509	PARKWAY SCHOOL - GAMMA	201	30.3	22.8	15.1	68.3
510	JONES, JOHN PAUL MIDDLE S	1188	67.2	18.0	6.3	91.5
511	PENN TREATY MIDDLE SCHOOL	879	75.0	17.0	3.6	95.6
512	STETSON, JOHN B. MIDDLE S	992	70.3	20.2	4.3	94.7
513	WANAMAKER, JOHN MIDDLE SC	691	75.1	16.9	3.6	95.6
514	STODDART-FLEISHER MID. SC	488	73.8	17.8	3.8	95.4
515	BODINE, WILLIAM W. H.S.	487	25.5	23.0	13.2	61.6
517	JULIA DE BURGOS-BILINGUAL	1070	74.8	17.1	3.7	95.5
520	ADAIRE, ALEXANDER SCHOOL	634	52.5	23.4	8.7	84.7
521	BROWN, HENRY A. SCHOOL	410	74.9	17.0	3.7	95.6
522	CLYMER, GEORGE SCHOOL	689	71.8	19.1	4.1	95.0
523	CONWELL, RUSSELL MIDDLE S	889	38.9	20.0	13.3	72.2
524	DOUGLAS, STEPHEN A. SCHOO	230	64.3	19.5	6.8	90.7
525	DUNBAR, PAUL L. SCHOOL	322	62.1	20.8	7.3	90.2
526	ELKIN, LEWIS SCHOOL	908	77.5	15.2	3.3	96.0
527	ELVERSON, JAMES MIDDLE SC	616	74.2	17.5	3.8	95.4
528	FAIRHILL SCHOOL	539	75.7	16.5	3.5	95.7

NUMBER	SCHOOL NAME	TOTAL STUDENTS	% WELFARE MATCHED	ESTIMATED FREE	ESTIMATED REDUCED	TOTAL % LOWING
529	FERGUSON, JOSEPH C. SCHOO	542	82.3	14.0	2.1	98.4
530	HACKETT, HORATIO B. SCHOO	541	64.9	19.2	6.7	90.9
531	HARRISON, WILLIAM H. SCHOO	391	83.6	12.9	1.9	98.5
532	HARTMANFT, JOHN F. SCHOO	663	81.3	14.8	2.2	98.3
533	HUNTER, WILLIAM H. SCHOO	334	75.7	16.4	3.5	95.7
534	LUDLOW, JAMES R. SCHOO	387	80.1	15.7	2.3	98.2
535	MC KINLEY, WILLIAM SCHOO	408	74.8	17.1	3.7	95.5
537	MOFFET, JOHN SCHOO	490	72.2	18.8	4.0	95.1
538	ALLEGHENY SCHOO	75	70.7	19.9	4.3	94.8
539	POTTER-THOMAS SCHOO	738	75.6	16.5	3.5	95.7
540	RICHMOND SCHOO	516	51.7	23.8	8.9	84.4
541	SHEPPARD, ISAAC SCHOO	439	82.0	14.2	2.1	98.4
542	WELSH, JOHN SCHOO	632	76.9	15.7	3.4	95.9
543	AMY AT JAMES MARTIN	331	38.1	20.3	13.4	71.8
544	WILLARD, FRANCES E. SCHOO	541	74.1	17.5	3.8	95.4
545	CARROLL, CHARLES SCHOO	314	51.3	24.0	9.0	84.3
547	CRAMP, WILLIAM SCHOO	869	71.5	19.4	4.1	95.0
548	KEARNY, GEN PHILIP SCHOO	293	79.2	14.1	3.0	96.3
549	CAYUGA SCHOO	417	64.5	19.5	6.8	90.8
553	SHERIDAN, PHILIP H. SCHOO	643	63.5	20.0	7.0	90.5
556	SPRING GARDEN SCHOO	300	83.7	12.9	1.9	98.5
559	WEBSTER, JOHN H. SCHOO	604	57.9	20.7	7.7	86.4
601	CENTRAL HIGH SCHOO	2251	11.5	18.6	13.8	43.9
602	GERMANTOWN HIGH SCHOO	1586	47.7	24.1	9.7	81.5
603	ROXBOROUGH HIGH SCHOO	1253	30.0	22.9	15.2	68.1
604	SAUL, WALTER B. HIGH SCHOO	626	18.5	17.1	12.7	48.3
605	GIRLS, HIGH SCHOO FOR	1321	18.8	17.0	12.7	48.5
606	KING, MARTIN LUTHER HIGH	2396	36.9	20.6	13.7	71.2
610	LEEDS, MORRIS E. MIDDLE S	902	33.5	21.8	14.4	69.7
611	ROOSEVELT, THEODORE MIDDLE	725	52.7	23.3	8.7	84.7
615	PICKETT, CLARENCE E MIDDLE	995	60.5	21.6	7.6	89.7
616	LEWIS, ADA H. MIDDLE SCHOO	889	49.5	23.3	9.4	82.1
620	DAY, ANNA B. SCHOO	476	52.3	23.5	8.8	84.6
621	EDMONDS, FRANKLIN S. SCHOO	726	41.2	27.1	10.9	79.2
622	EMLIN, ELEANOR C. SCHOO	702	52.0	23.7	8.8	84.5

NUMBER	SCHOOL NAME	TOTAL STUDENTS	% WELFARE MATCHED	ESTIMATED FREE	ESTIMATED REDUCED	TOTAL % LOW INC
623	FITLER ACADEMICS PLUS	475	32.2	22.2	14.7	69.1
624	FULTON, ROBERT SCHOOL	378	66.4	18.4	6.5	91.3
625	HENRY, CHARLES W. SCHOOL	680	19.0	17.0	12.6	48.6
626	HOUSTON, HENRY E. SCHOOL	795	27.5	22.3	12.8	62.7
627	JENKS, JOHN S. SCHOOL	552	14.7	17.9	13.3	45.9
628	KINSEY, JOHN L. SCHOOL	506	61.9	20.9	7.3	90.1
629	LEVERING, WILLIAM SCHOOL	506	42.1	26.7	10.8	79.5
630	LOGAN SCHOOL	509	64.8	19.3	6.8	90.9
631	MC CLOSKEY, JOHN F. SCHOO	335	33.7	21.7	14.4	69.8
632	MIFFLIN, THOMAS SCHOOL	395	71.4	19.4	4.2	94.9
633	PASTORIUS, FRANCIS P. SCH	702	62.0	20.8	7.3	90.1
634	PENNEL, JOSEPH SCHOOL	514	56.4	21.5	8.0	85.9
635	PENNYPACKER, SAMUEL SCHOOL	615	47.2	24.3	9.8	81.3
638	SHAMMONT SCHOOL	731	17.5	17.3	12.9	47.7
639	STEEL, EDWARD SCHOOL	773	69.1	16.9	5.9	92.0
640	WIDENER MEMORIAL SCHOOL	278	46.4	24.7	10.0	81.0
641	COOK-WISSAHICKON SCHOOL	436	57.6	20.9	7.8	86.3
643	WISTER, JOHN SCHOOL	483	69.8	16.6	5.8	92.1
644	LINGELBACH, ANNA L. SCHOO	359	42.3	26.5	10.7	79.6
645	DOBSON, JAMES SCHOOL	313	51.4	23.9	8.9	84.3
646	HILL, J.E. / SAMPSON FREED	232	30.2	22.8	15.2	68.2
647	KELLY, JOHN B. SCHOOL	884	65.4	19.0	6.6	91.0
648	AMY NORTHWEST	230	31.3	22.5	14.9	68.7
654	GERMANTOWN-LANKENAU	447	13.6	18.1	13.5	45.2
701	FRANKFORD HIGH SCHOOL	1662	32.6	22.1	14.6	69.3
702	OLNEY HIGH SCHOOL	2469	47.9	24.0	9.7	81.6
710	COOKE, JAY MIDDLE SCHOOL	1112	60.0	21.9	7.7	89.6
711	HARDING, WARREN G. MIDDLE S	999	48.5	23.7	9.6	81.8
712	FELS, SAMUEL SR. HIGH	1256	24.7	23.2	13.3	61.2
713	WAGNER, GEN. LOUIS MIDDLE	971	45.9	24.9	10.1	80.9
720	BARTON, CLARA SCHOOL	735	59.6	19.9	7.4	86.9
721	BIRNEY, GEN. DAVID B. SCH	1074	66.7	18.3	6.4	91.3
722	CARNELL, LAURA H. SCHOOL	982	29.7	21.6	12.5	63.8
724	CREIGHTON, THOMAS SCHOOL	762	39.5	19.8	13.1	72.4
725	EDMUNDS, HENRY R. SCHOOL	760	29.6	21.7	12.5	63.8



NUMBER	SCHOOL NAME	TOTAL STUDENTS	% WELFARE MATCHED	ESTIMATED FREE	ESTIMATED REDUCED	TOTAL % LOW INC
726	ELLWOOD SCHOOL	578	30.8	22.6	15.0	68.5
727	FINLETTER, THOMAS K. SCHO	803	31.9	22.3	14.8	69.0
728	FRANKLIN, BENJAMIN SCHOOL	553	24.2	23.3	13.4	61.0
729	STEARNE, ALLEN M. SCHOOL	447	61.1	21.3	7.5	89.9
730	HOPKINSON, FRANCIS SCHOOL	774	50.0	24.7	9.2	83.8
731	FELTONVILLE SCHOOL	525	58.9	20.3	7.6	86.7
732	HOME, JULIA WARD SCHOOL	436	59.2	20.1	7.5	86.8
733	LAWTON, HENRY W. SCHOOL	497	23.3	23.6	13.6	60.5
735	LOWELL, JAMES R. SCHOOL	839	41.6	26.9	10.9	79.3
736	MARSHALL, JOHN SCHOOL	277	60.6	21.6	7.6	89.8
738	MC CLURE, ALEXANDER K. SC	678	74.6	17.2	3.7	95.5
739	MORRISON, ANDREW J. SCHOO	738	42.3	26.6	10.7	79.6
740	OLNEY ELEMENTARY SCHOOL	644	41.5	26.9	10.9	79.3
742	SMEDLEY, FRANKLIN SCHOOL	475	67.6	17.8	6.2	91.6
743	SULLIVAN, JAMES J. SCHOOL	494	47.4	24.2	9.8	81.4
744	TAYLOR, BAYARD SCHOOL	593	72.0	19.0	4.1	95.1
746	ZIEGLER, WILLIAM H. SCHOOL	230	22.2	24.0	13.8	59.9
747	BRIDESBURG SCHOOL	320	41.6	26.9	10.9	79.3
749	PRINCE HALL	623	47.8	24.0	9.7	81.6
750	CENTRAL EAST MIDDLE	713	53.4	23.0	8.6	85.0
751	BETHUNE, MARY MC LEOD SCH	736	73.5	18.0	3.8	95.3
753	ROWEN, WILLIAM SCHOOL	578	55.2	22.1	8.2	85.5
773	CLEMENTE, ROBERTO MIDDLE S	1072	67.4	17.8	6.3	91.5
801	LINCOLN, ABRAHAM HIGH SCHO	1994	26.3	22.7	13.1	62.1
802	NORTHEAST HIGH SCHOOL	2717	17.9	17.2	12.8	48.0
803	WASHINGTON, GEORGE HIGH S	2984	16.6	17.5	13.0	47.1
812	WILSON, WOODROW MIDDLE	1204	21.8	24.1	13.9	59.8
814	MEEHAN, AUSTIN MIDDLE SCH	954	33.9	21.6	14.4	69.9
815	RUSH, BENJAMIN MIDDLE SCH	1100	30.8	22.6	15.0	68.5
816	BALDI, C. C. A. MIDDLE SC	1177	18.4	17.1	12.7	48.3
818	HANCOCK, JOHN SCHOOL	462	21.6	24.1	13.9	59.7
820	ALLEN, ETHAN SCHOOL	456	33.1	21.9	14.5	69.5
821	BROWN, JOSEPH H. SCHOOL	384	35.7	21.0	14.0	70.7
823	CROSSAN, KENNEDY C. SCHOOL	218	25.2	23.0	13.3	61.5
824	DISSTON, HAMILTON SCHOOL	571	36.1	20.9	13.9	70.9

NUMBER	SCHOOL NAME	TOTAL STUDENTS	% WELFARE MATCHED	ESTIMATED FREE	ESTIMATED REDUCED	TOTAL % LOWING
825	FORREST, EDWIN SCHOOL	463	35.0	21.3	14.1	70.4
826	FOX CHASE SCHOOL	368	26.6	22.6	13.0	62.2
827	HOLME, THOMAS SCHOOL	497	57.1	21.1	7.9	86.2
830	MAYFAIR SCHOOL	434	25.8	22.9	13.1	61.8
831	MOORE, J. HAMPTON SCHOOL	608	21.1	24.3	14.0	59.4
832	LA BRUM GEN J HARRY MIDDLE	368	29.9	21.6	12.4	63.9
833	SHALLCROSS DAY SCHOOL	146	40.4	27.4	11.1	78.9
834	SOLIS-COHEN, SOLOMON SCHOOL	600	30.5	22.7	15.1	68.3
835	SPRUANCE, GILBERT SCHOOL	827	26.0	22.8	13.1	61.9
836	RHAWNURST SCHOOL	365	28.5	22.0	12.7	63.2
837	COMLY, WATSON SCHOOL	394	10.4	18.8	14.0	43.2
838	FARRELL, LOUIS H. SCHOOL	763	28.8	21.9	12.6	63.4
839	FITZPATRICK, ALOYSIUS L.	445	31.0	22.6	15.0	68.6
840	FRANK, ANNE SCHOOL	697	18.8	17.0	12.7	48.5
841	POLLOCK, ROBERT B. SCHOOL	416	25.7	22.9	13.2	61.8
842	DECATUR, STEPHEN SCHOOL	635	29.6	21.7	12.5	63.8
843	GREENBERG, JOSEPH SCHOOL	552	5.8	19.8	14.7	40.3
844	LOESCHE, WILLIAM H. SCHOOL	744	25.0	23.1	13.3	61.4
854	PENNYPACK ANNEX SCHOOL	193	5.2	19.9	14.8	39.9



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF EDUCATION  
333 MARKET STREET  
HARRISBURG, PA 17126-0333  
[www.pde.state.pa.us](http://www.pde.state.pa.us)

July 8, 2005

Mr. Wayne Grasela  
Division of Food Services  
School District of Philadelphia  
440 North Broad Street  
Philadelphia, PA 19146

Dear Wayne:

The United States Department of Agriculture (USDA) has approved the School District of Philadelphia's (SDOP) continued use of 1994 free and reduced price meal claiming percentages for schools operating under the Paperwork Reduction Pilot Project. The USDA has advised us that the 2005-06 School Year is likely the last year the 1994 claiming percentages can be used to claim federal and state meal reimbursements.

In the next few months, the USDA will engage SDOP and Pennsylvania Department of Education (PDE) staff in discussions regarding options to transition SDOP into a current and acceptable set of data for use in claiming federal and state funds.

Please call me with any questions or comments at (717) 783-6556.

Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Pat Birkenshaw".

Patricia Birkenshaw  
State Director  
Child Nutrition Programs  
Division of Food and Nutrition  
Bureau of Budget and Fiscal Management

cc: Vonda Fekete  
Sandy Souder

February 15, 2007

**via e-mail: [appeals@sl.universalservice.org](mailto:appeals@sl.universalservice.org)**

Letter of Appeal

Schools and Libraries Division – Correspondence Unit

100 South Jefferson Road

PO Box 902

Whippany, NJ 07981

**LETTER OF APPEAL  
FRN DENIALS**

<b>Applicant:</b>	School District of Philadelphia
<b>Entity Number:</b>	126161
<b>Form 471 Application No.:</b>	519253
<b>Funding Year:</b>	2006
<b>FRN Number:</b>	1443032 and 1443041
<b>FCDL Decision Date:</b>	12/20/2006

The School District of Philadelphia (“SDP”), by its undersigned representative, hereby appeals the FRN denials of the Schools and Libraries Division (“SLD”) of the Universal Service Administrative Company in the above-captioned matter.

**ISSUE FOR CLARIFICATION ON APPEAL:**

- Did the SLD correctly reduce the funding discount rate requested on the above referenced Funding Requests?

**STATEMENT OF FACTS**

SDP filed FRN 1443032 and FRN 1443041 requesting Internal Connections at an 80% discount rate level. Both of the above referenced funding requests were denied for the

following reason, “Given demand, the funding cap will not provide for Internal Connections/Basic Maintenance of Internal Connections at your approved discount level to be funded.” However, both of these FRNs were originally filed requesting 80% discount level funding, which at the current time is not at a level being denied for being below the discount rate threshold. It appears both of the funding requests were reduced to 79% discount levels and then were denied for being below the discount rate threshold.

## **DISCUSSION**

In October 2006, SDP responded to PIA regarding 2 of the 54 sites listed on the FRNs at issue. A copy of the relevant PIA question and response are attached as Exhibit A. At that time, SDP provided documentation to support the requested discount rate of 80%. No further questions regarding the provided documentation were ever received, nor were any questions received regarding the other 52 sites on the FRN.

SDP does use an alternative discount method to determine the discount rate for many of its school sites. Per the FCC and the USAC website, the use of alternative discount mechanisms is allowed. If the PIA reviewer had additional questions regarding the District’s numbers, the reviewer never asked them to SDP. This same alternative discount method has been used by SDP since they began applying for Universal Service funding. Before the District’s discount rate was reduced, the District should have been alerted during PIA and given a chance to defend their numbers. This has been the first time SDP had a reduction in the requested discount amount. As such, the District is concerned the reviewer misunderstood the discount rate calculation and should have made further inquiries before reducing the discount rate.

**ADMINISTRATIVE ACTION REQUESTED**

The District should have been provided with an opportunity to support their requested discount rate before it was reduced by the PIA reviewer. Accordingly, SDP requests that the SLD reverse the decision that the above referenced FRNs should be reduced to 79% and remand the case back to PIA for further inquiry.

Respectfully,



John D. Harrington  
Funds For Learning, LLC  
On Behalf of The School District of Philadelphia

501 South Coltrane  
Edmond, OK 73003  
405.341.4140  
[jharrington@fundsforlearning.com](mailto:jharrington@fundsforlearning.com)

## Exhibit A

FCC Form 471  
Program Integrity Assurance Response

School District of Philadelphia  
Funding Year 2006

**Application No. 519253**



471AN: 519253  
Question No.: 1  
RE: Item 21 Attachments  
FRN: None Specified

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**Question**

USAC has not yet received the Item 21 Attachments for your FY2006 Form 471 application # 519253. In order to process the Form 471, we must receive the Item 21 Attachments. If you are unsure what constitutes an Item 21 Attachment, please refer to the Form 471 Instructions available at: Step 7: Submit Application for Support <http://www.universalservice.org/sl/applicants/step07/> for support/

If you have not yet submitted the Item 21 Attachments, please do so using our online system available at [www.sl.universalservice.org/menu.asp](http://www.sl.universalservice.org/menu.asp) and then notify us when this is done, or forward the Item 21 Attachments to our attention at the fax number indicated below.

If you have already submitted the Item 21 Attachments, please fax an EXACT COPY of the Item 21 Attachments that were previously submitted. If you do not wish to resubmit the Item 21 Attachment, you are not required to do so. We will process your application once the Item 21 Attachments are available in our online system or have been imaged into our system.

**Response**

The district submitted the Item 21 attachments for Application Number 519253 via the SLD on-line submission tool on October, 13<sup>th</sup> 2006.

471AN: 519253  
Question No.: 2  
RE: Parkway Center and Parkway Northwest Discount Percentage  
FRN: None Specified

---

**Question**

Based upon review of your Form 471 application, we were not able to validate your requested discount percentages of:

- a) PARKWAY CENTER CITY 80%
- b) PARKWAY NORTHWEST 80%

If you choose to validate your original requested discount percentages, then please provide the appropriate documentation if one of the following acceptable methods you used to calculate your discount:

a.) If the school participates in a National School Lunch Program (NSLP), please provide a signed copy (preferably by the Principal, Vice-Principal, Superintendent or chief school official, or Director of Food Services) of a Reimbursement Claim Form that the school sends to the state each month. Make sure that the following 3 items are identified:

- 1.) The Entity name
- 2.) The total number of students enrolled at the entity
- 3.) The total number of students eligible for Free/Reduced Lunch Program for the entity

If the school district fills out an aggregate claim form for the school district, also provide a signed letter from a school official (preferably the Superintendent or chief school official) that lists the enrollment and Free/Reduced information for each school in the district. The enrollment and Free/Reduced information provided in your letter should match the claim form.

b.) If the discount percentage was determined by information obtained from a survey/application (National School (Free & Reduced) Lunch Application forms cannot be used as survey instruments), please provide the following information in writing on school letterhead signed by a school official (such as the Principal, Vice Principal, Superintendent or Director of Food Services):

- 1.) Total number of students enrolled
- 2.) Total number of surveys/applications sent out
- 3.) Number of surveys/applications returned
- 4.) Total number of students qualified for NSLP per the returned surveys/applications
- 5.) Are the surveys/applications and results kept on file.
- 6.) Provide a sample copy of a FILLED OUT SURVEY/APPLICATION with the child's personal information crossed out for confidentiality.
- 7.) A signed certification that reads: "I certify that only those students who meet the Income Eligibility Guidelines of the National School Lunch Program have been included in Column 5 of Item 9a, of Block 4 of the Form 471."

c.) If the discount was determined using a different method than what was identified above, please indicate the method that was used and provide all relevant data.

**Response**

Questions concerning the Parkway schools were raised during the review of other District applications earlier this year. We attached a May 10, 2006 e-mail to Joel Salaveria and the document to which the e-mail refers to the end of our response (pages 6-31). Please let us know if you have any additional information requests concerning these two sites.

471AN: 519253  
Question No.: 3  
RE: Notice of Possible Errors  
FRN: None Specified

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### **Question**

#### **NOTICE OF POSSIBLE ERRORS:**

The following items on your Form 471 may contain errors, but we were unable to detect them during our review process:

- Block 1 - Billed Entity Name, Billed Entity Number or Billed Entity contact information.
- Block 4 - Discount calculation worksheets
- Block 5 - Service Provider Identification Number (SPIN) or service provider name (if the change is a corrective rather than operational change)
- Block 5 - Contract number
- Block 5 - Billing account number
- Block 5 - Funds requested in an FRN
- Block 5 - Entity(ies)/Worksheet cited in an FRN
- Block 6 - Amount budgeted for ineligible services

If you detect any errors in these items, you can make corrections during the next 15 days. To request a correction, make a copy of your Form 471 and draw a line through each incorrect item and mark clearly next to it the corrected information.

It is your responsibility to review your Form 471 application and provide corrections to us. All corrections should be submitted to me by fax or email.

### **Response**

At this time, the District is not aware of any ministerial or clerical errors on its Form 471 that would require a correction. The District reserves the right to make corrections if errors are found at a later date. In the event USAC discovers errors, the District requests USAC inform them in writing of the errors, along with a clear and specific explanation of how the District should remedy those errors. See Bishop Perry Order, File Nos. SLD-487170, et al., CC Docket No. 02-6, 21 FCC Rcd 5316, para. 23 (rel. May 19, 2006).

## Micah Rigdon

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**From:** Cathy Cruzan  
**Sent:** Wednesday, May 10, 2006 4:56 PM  
**To:** 'Salaveria, Joel'  
**Cc:** Philadelphia; 'Jennifer Gardner'  
**Subject:** SDP PIA Apps 517299 Response

Mr. Salaveria,

The response to PIA inquiry application 517299 is 7MB. I was concerned that due to the size of the file you might not be able to receive it as an email attachment. For convenience I have provided a link below that you can download this file from. Please reply by email so that I know that you have been able to successfully download this PIA application response. Once again thank you for your assistance and please contact me directly if you have any questions or need further documentation.

Thank you,

Cathy

[Click here](#) to download your files, or copy & paste the below link into your browser (be sure to get both lines if your e-mail client wraps the text):

<http://www.eratemanager.com/sendfile/getFiles.php?id=14&key=d80d59e27d1c2c47af775b59c71247e4>

To conserve our server space, these files will be deleted on Wednesday, May 17th, 2006 at 04:48 PM. If you need to download the files afterwards, the sender will need to re-upload the files.

Cathy Cruzan | Director of Client Operations

**Funds For Learning, LLC** | 501 S. Coltrane Road | Edmond, OK 73034

Direct 405.341.4140, x. 165 | FAX 405.341.7008

[ccruzan@fundsforlearning.com](mailto:ccruzan@fundsforlearning.com) | [www.fundsforlearning.com](http://www.fundsforlearning.com) | [www.eratemanager.com](http://www.eratemanager.com)

---

**From:** Salaveria, Joel [<mailto:JSALAVE@sl.universalservice.org>]  
**Sent:** Wednesday, May 10, 2006 8:30 AM  
**To:** Cathy Cruzan  
**Cc:** Philadelphia; Jennifer Gardner  
**Subject:** RE: SDP Apps 517299 and 518215

Thank you very much.

Sincerely,

**Joel Salaveria**  
Schools And Libraries Division  
Program Integrity Assurance  
Phone : (973) 581-5055  
Fax : (973) 599-6513  
e-mail address: [jsalave@sl.universalservice.org](mailto:jsalave@sl.universalservice.org)

---

**From:** Cathy Cruzan [<mailto:ccruzan@fundsforlearning.com>]

10/20/2006

**Sent:** Wednesday, May 10, 2006 9:27 AM  
**To:** Salaveria, Joel  
**Cc:** Philadelphia; Jennifer Gardner  
**Subject:** RE: SDP Apps 517299 and 518215

Mr. Salaveria,

Thank you for your prompt response. I have attached the requested LOA per your request.

Kind regards,

Cathy

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**From:** Salaveria, Joel [mailto:JSALAVE@sl.universalservice.org]  
**Sent:** Wednesday, May 10, 2006 6:26 AM  
**To:** Cathy Cruzan  
**Cc:** Philadelphia  
**Subject:** RE: SDP Apps 517299 and 518215

Good morning Cathy,

I am granting your request for extension until May 17, 2006. Please also provide LOA for providing information for the district's E-rate applications. Thanks.

Sincerely,

**Joel Salaveria**  
Schools And Libraries Division  
Program Integrity Assurance  
Phone : (973) 581-5055  
Fax : (973) 599-6513  
e-mail address: jsalave@sl.universalservice.org

---

**From:** Cathy Cruzan [mailto:ccruzan@fundsforlearning.com]  
**Sent:** Tuesday, May 09, 2006 4:19 PM  
**To:** Salaveria, Joel  
**Cc:** Philadelphia  
**Subject:** SDP Apps 517299 and 518215

Mr. Salaveria:

Regarding your PIA request for the School District of Philadelphia applications 517299 and 518215, we will have a response for the items on application 517299 (priority one services) ready for your review tomorrow. The District would like to formally request additional time to respond to the PIA request for application 518215 (priority two services). Please let us know if this request for additional time for application 518215 is acceptable.

Thank you for your consideration and review of the District's applications.

Cathy

Cathy Cruzan | Director of Client Operations  
**Funds For Learning, LLC** | 501 S. Coltrane Road | Edmond, OK 73034  
Direct 405.341.4140, x. 165 | FAX 405.341.7008

10/20/2006

[ccruzan@fundsforlearning.com](mailto:ccruzan@fundsforlearning.com) | [www.fundsforlearning.com](http://www.fundsforlearning.com) | [www.eratemanager.com](http://www.eratemanager.com)

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471AN(s): 517299 and 518215  
Question No.: B  
RE: Discount Rate Validation  
FRN: none specified

---

### Question

*Based upon review of your Form 471 application, we were not able to validate your requested discount for the following schools:*

20378	FRANKLIN LEARNING CENTER	90
176004	PARKWAY CENTER CITY	80
225612	PARKWAY NORTHWEST	80

*If you choose to validate your original requested discount percentage, then please provide the appropriate documentation if one of the following acceptable methods were used:*

- c. *If the discount was determined using a different method than what was identified above, please indicate the method that was used and provide all relevant data.*

### Response

#### Franklin Learning Center

The number of students eligible for the National School Lunch Program at Franklin Learning Center is 495. The number listed on the Form 471 application is an error. The correct E-rate discount for this location is 80%.

#### Parkway Schools

The District uses an alternative, USDA-approved approach to calculate the number of NSLP-eligible students at certain school sites. This alternative, referred to as the “Yancey Study,” is described below.

### OVERVIEW OF METHODOLOGY

The District identifies families who qualify for NSLP either (A) through their inclusion on the public welfare records or (B) through their response to an in-person or telephone questionnaire. Therefore, the District does not use surveys to calculate the number of students eligible for free and reduced-price lunch. The attached report describes this methodology with great specificity. (See “Philadelphia-Yancey-NSLP.pdf”)

The percentage of students eligible for free or reduced-price meals at each of the two sites in question can be found in the Yancey Study. These percentages are listed in the far-right column of the data listed at the end of the report. The table below summarizes where you can find the data needed to validate the discount request for these two sites.

BEN	Admin No.	Site Name	Name As Listed in Study	Page Number	%NSLP-Eligible Students	E-rate Disc.
176004	508	Parkway Center City	Parkway School-Center City	17	70.00%	80%
225612	507	Parkway Northwest	Parkway S G Lasalle Univ.	17	62.50%	80%

If there is additional information required concerning the methodology used to calculate the NSLP-eligibility of the District’s school sites, please feel free to contact the District.



# A Socio-Economic Study of Students Attending Philadelphia Public Schools

William L. Yancey, Ph.D.

Institute for Public Policy Studies  
Temple University

November 10, 1994

## Introduction

This report presents the findings of a two step process designed to estimate the number of Philadelphia public school students who are qualified for free or reduced price lunches. In the first step, the School District identified students who were automatically qualified for free lunches. These students were identified through computer searches of files supplied by the Pennsylvania Department of Public Welfare. If a student lived in a family that received Public Assistance, they were automatically qualified for a free lunch in Philadelphia public schools. Once the School District completed its computer match, we were presented with two critical pieces of information:

- o The number of students who automatically qualify for a free lunch - overall and for each school;
- o The names, addresses, telephone numbers and most recent school attended of those students who do not automatically qualify for free lunches.

This is a study of the students who were not matched on the welfare files. Two thousand five hundred and thirty five (2,535) students were selected through a stratified random sampling process. These students are representative of the 91,716 active non-matched (i.e., not belonging to a family on the welfare lists) students in the District. Through a combination of telephone and face-to-face interviews, information was obtained regarding the income level and household size for these students. These are the two pieces of information required to determine which students would qualify for a free lunch if they were to make an application.

Our research shows that 71% of the students attending Philadelphia's public schools are qualified for free lunches. This figure includes the:

- o 50% who were identified on the welfare roles

(i.e., automatically qualified) and

- o 42% of the non-welfare students, or 21% of the total, that were qualified for free lunches based on income and household size.

In addition 18% of the non-welfare students, or 9% of the total were qualified for reduced price lunches. Together this research indicates that 80% of the students attending Philadelphia's public schools live in low-income households.

A similar study, conducted in 1991, found that 75% of public school students were from low income families, thus in only three years there has been an 5% increase in the number of students from low income families. This increase is consistent with the changing rates of poverty in the city of Philadelphia over this period. In 1991 the Current Population Survey found 20.7 percent of households had incomes which were below the poverty level. The 1993 Current Population Survey found 26.5 percent of households with incomes below the poverty level. The increasing rate of poverty is also reflected in the number of AFDC cases in Philadelphia. The state welfare department reports that AFDC cases increased from 144,828 cases in 1990-91, to 169,060 cases in 1993-94.

What follows is a detailed description of the procedures we followed to generate these estimates. First, we present a description of the sample design. Next, we describe the questionnaire and method of data collection. Included is a discussion of the potential bias resulting from interviews that were not completed, and a comparison of results obtained from telephone and field interviews. Estimates of the percent of non-welfare students qualified for free and reduced price and confidence intervals for these estimates lunches are provided. The appendix lists the 265 schools included in this research and shows the percent of students who were matched on the welfare files, and the estimates of the percent who were qualified for free and reduced price lunches.

### Sample Design

A cursory examination of the data describing the percent of school's non-welfare students that were qualified for free or reduced price lunches, and the percent of students who received welfare, revealed that schools with a larger proportion of welfare students tended to have a higher proportion of non-welfare students who were qualified for free or reduced lunches. This finding strongly indicated that:

More precise estimates of the percent of non-welfare students qualified for free or reduced price lunches could be obtained if, for sampling purposes, schools were stratified - or divided - by the proportion of student/households receiving welfare.

All active non-welfare students were placed in one of eight groups based on the school they were most recently attending. Schools were divided into strata according to the proportion of the school's students who were matched by the welfare files. Then a pre-determined number of students/households were randomly selected from within each of the strata, regardless of grade or school.

The sample was designed to produce a sufficient number of interviews to make accurate estimates of the percent of students qualified for free and reduced price lunches for each strata. The accuracy of these estimates rests on the relative size of strata and the expected proportion of students who are qualified for participation in categorical programs. Experience tells us to expect some incorrect telephone numbers and addresses, as well as refusals to participate. Therefore the initial sample of student/households was larger than the required number of completed interviews.

Table 1 provides the basic information as to the number of schools, number of students, and number of students drawn in each strata. The sample represented approximately 4% - or one-in-twenty-five - of the total eligible students. In strata 8 (over 80% welfare match) the percent of eligible students who were sampled is significantly higher (67%). This is because the total number of non-welfare students in this strata is small and in order to get a sufficient number of interviews, we had to oversample. For the analysis, interviews have been weighted by the inverse of the probability of their selection.

Table 1: Schools, Study Population (Non-Welfare Students) and Sample Size by Strata

Strata	Percent Welfare Match	Schools	Non-Welfare Student Population	Sample
1	0-19	18	14626	279
2	20-29	30	14384	315
3	30-39	29	12197	442
4	40-49	36	17341	468
5	50-59	30	9633	549
6	60-69	60	15218	515
7	70-79	51	7445	523
8	80-100	11	872	586
Total		265	91716	3677

### The Questionnaire:

The questionnaire was short. It was designed to obtain only that information necessary to classify households into one of three categories:

- o qualified for free lunch;
- o qualified for reduced priced lunch;
- o required to pay full price for lunch.

We placed students into these categories based on the USDA's 1993-94 guidelines regarding household size and income.

The questionnaire began with a series of questions which verified that the household was the primary residence and person being interviewed was guardian or parent of the student selected in the sample. This was followed by questions on how the student traveled to school and what the student did regarding lunch (i.e., did they bring a lunch from home, eat in school cafeteria, or buy lunch near school?).

These "warm-up" questions were followed by questions that addressed the number of children and adults living in the household. We asked if the student was a foster child, thereby automatically qualifying for free lunches. We also asked whether they received welfare and/or food stamps. Should the computer matching fail to identify all student-households receiving food stamps or welfare, positive answers to these questions meant the student was automatically qualified for free lunches.

Respondents were then asked a series of questions about their various sources of income. In order to insure maximum participation with this questionnaire, we asked how it was easiest for respondents to answer income questions (i.e. by the year, month or week).

Given the general sensitivity to questions concerning income, we chose not to ask direct questions as to the actual amount of income. For a given household size and payment period (yearly, monthly, or weekly), the interviewer guided by a Computer Assisted Telephone Interviewing system (CATI) asked whether or not household income was above or below the amount specified for reduced lunches, (i.e. 185% of the federal poverty level). Those whose income exceeded the 185% of federal poverty were then asked if their income was above or below the amount equivalent to 200% of the poverty level.

If the respondent's income was below 185% of the poverty level, they were asked if their income was below the amount specified for free lunches (135% of the poverty level). Those who qualified for free lunch were also asked if their income was below an amount equal to the poverty level. This procedure

satisfied the basic objectives of this study and we believe was one of the factors that contributed to the relatively few interviews broken off before critical income information was obtained.

#### Data Collection:

In order to increase the level of cooperation with this study, the Superintendent of the District sent a letter to the parents of students included in the sample. The letter requested the parent's cooperation in the research and assured them that their answers would be confidential.

Interviews were conducted by Chilton Research Services using a mixed telephone and personal interview methodology. Interviewing was conducted by professional interviewers trained and supervised by Chilton Research Services using a CATI system. Both telephone and face-to-face interviews were edited for legibility, completeness, consistency, logic, accuracy, and validity.

Telephone or personal interviews were conducted in Spanish as the need arose. Facilities for interviewing in other foreign languages were not available.

The data collection took place during the months of May, June, July and August of 1994. There were two phases of data collection. First, all initial contacts were attempted by telephone. When a telephone number was incorrect or not available, directory assistance was contacted to obtain a current number. At least five attempts or "call-backs" were made for each household.

During this initial phase of data collection there were some student households whose address and/or phone number were incorrect. These incorrect addresses and/or telephone numbers were over-represented among students attending schools with high percentages of welfare-matched students. The names of these students were given to the appropriate principals for a corrected address and phone number. This effort, concentrated in schools in the poorer strata, resulted in an additional 59 telephone interviews that would have otherwise been sent to field interviewers. Across all strata, telephone interviewing produced 2,127 interviews.

The second phase of data collection took place between July 8 and August 4. Households, who had not been contacted and interviewed by telephone, were given to field interviewers for a face-to-face interviews in the home. Up to three attempts were made to contact each household. Across all strata 333 face-to-face interviews were completed.

The sample included 75 students who had a sibling who was also included in the sample. If we had eliminated these "duplicates" from the study we would have under represented large families. Rather than conduct a second interview, information regarding family size and income was duplicated and these sibling-students included in the analysis.

The number of sampled households and the number of interviews that were completed are presented in Table 2. Telephone interviews are over-represented among the strata with fewer welfare students. Field interviews are more heavily concentrated among students attending schools with higher proportions of welfare students. This pattern of data collection was anticipated given the commonly accepted relationship between economic status and: (1) the accuracy of school records and (2) telephone availability in the home.

Table 2: Sample Size, Completed Interviews  
Total, Telephone and Field by Strata

Strata	1	2	3	4	5	6	7	8	Total
Sample	279	315	442	468	549	515	523	586	3677
<u>Interviews Completed</u>									
Telephone	184	215	291	285	313	290	286	263	2127
Field	19	19	32	38	37	62	56	70	333
Total	203	234	323	323	350	352	342	333	2460
Pct Field	9.4	8.1	9.9	11.8	10.6	17.6	16.4	21.0	13.5
Duplicates	2	3	6	4	9	4	9	38	75
<u>Total Students Represented</u>									
by Survey	205	237	329	327	359	356	351	371	2535

#### Non-Responses:

Interviews were completed for 69% of the households sampled. In spite of this high completion rate, the remaining 31% are non-responses and represent potential bias in this research.

There are many reasons why the parents of students, drawn from the District's records of active students might not have been interviewed. A few parents refused to answer critical questions about income. Some parents spoke neither English or Spanish. Telephone numbers and addresses were incorrect. In some cases the interviewers judged the residential areas so dangerous that they refused to enter. One interviewer was mugged.

We have classified the non-responses into four groups. First are the "Refusals." This group consists of households that were contacted but the respondent refused to participate in the study, broke off the interview before answering questions concerning income, or continued to insist that we "call-back" at a more convenient time. Nine percent of the sample (342 cases) refused to participate.

Second are those who spoke neither English or Spanish. Apparently most of these respondents were recent Asian immigrants. Less than two percent of the sample (65 cases) were lost because of a language barrier.

Third are households that were apparently correctly identified but, in spite of five attempts, contact was never made. No one answered the phone, an answering machine was always on, the phone was always busy, or no one answered the door. We were unable to contact, either by phone or in person, eleven percent of the sample (390 cases).

Finally, there were the relative large number of student-households (345) that contained incorrect telephone numbers and addresses. Some houses were vacant, some addresses did not exist; families or students had moved.

The potential bias resulting from these non-responses may be evaluated by comparing the distributions of the reasons for non-responses across the eight sampling strata to the distribution of the sample. The number of non-responses for each of these four sources, by sampling strata, are given in Table 3. We have also calculated the non-response rates, both total and for each of the four sources, across the eight sampling strata. The rates are the percent of the sample that did not result in a completed interview.

Table 3: Interviews and Non-Responses by Strata

Strata	Sample and Completed Interviews								Total
	1	2	3	4	5	6	7	8	
Sample	279	315	442	468	549	515	523	586	3677
Interviews	203	234	323	323	350	352	342	333	2460
Duplicates	2	3	6	4	9	4	9	38	75
Total Students Represented	205	237	329	327	359	356	351	371	2535
	Number of Uncompleted Interviews by Reason								Total
	1	2	3	4	5	6	7	8	
Total Incompletes	74	78	113	141	190	159	172	215	1142
Refusals	31	30	44	37	65	48	39	48	342
Language Barrier	7	16	8	12	11	8	2	1	65
No Contact Made	26	19	36	55	59	58	64	73	390
Incorrect Information	10	13	25	37	55	45	67	93	345

Table 3: continued

Strata	Rates of Uncompleted Interviews								Total
	1	2	3	4	5	6	7	8	
Total Incomplete	26.5	24.8	25.6	30.1	34.6	30.9	32.9	36.7	31.1
Refusals	11.1	9.5	10.0	7.9	11.8	9.3	7.5	8.2	9.3
Language Barrier	2.5	5.1	1.8	2.6	2.0	1.6	0.4	0.2	1.8
No Contact Made	9.3	6.0	8.1	11.8	10.7	11.3	12.2	12.5	10.6
Incorrect Information	3.6	4.1	5.7	7.9	10.0	8.7	12.8	15.9	9.4

Examination of these distributions indicates that the first two types of non-responses are either few in number or are not heavily skewed in one direction or the other. The rates which respondents refused to participate is similar (9% to 12%) across all strata. There appears to be slight tendency for refusals to occur more often in strata with the lowest rates of welfare. Language barriers, although rare, occurred in all strata. A language barrier was most frequently encountered with students attending schools with the lowest proportion of welfare families.

The rate of non-response resulting from our inability to contact the household and from incorrect information is highest among those strata with the higher proportions of welfare families. If the general pattern observed across strata, indicating that incorrect information is more characteristic of students attending schools with high proportions of students receiving welfare is also true within stratum, then this study may under-represent the poorest children.

One way to explore this issue is to compare the results that were obtained from telephone interviews with the results of face-to-face interviews. The telephone interviews were completed with households with correct telephone numbers and/or addresses in the District's files. The field interviews consisted of households that we were unable to contact by telephone.

We have already noted that the face-to-face interviews were more heavily concentrated in the poorer strata. Thus it is expected that face-to-face interviews produce a higher proportion of students that were qualified for free lunches (45.5%) than did telephone interviews (26.7%). This tendency is also found within sampling strata.

Table 4 presents the proportions of students who were qualified for free lunches by whether the interview was interviewed by telephone or in person. Face-to-face interviews took place because of our inability to contact the household by telephone. Not only are these more likely to have occurred among the poorer strata, but within each strata, face-to-face interviews are more likely to occur for students who are qualified for free lunches. Stated differently, if there is a



bias in this study resulting from non-responses due to inadequate or incorrect information, it is likely that we have under-represented the percent of students that are qualified for free lunches. These results also indicate that had we relied on telephone interviewing alone, this under-estimation would have presented a severe flaw in our inquiry.

Table 4: Percent of Students Qualified by  
for Free Lunch by Interviewing Method  
and Sampling Strata

Strata	Face-to-Face	Telephone
1	47.4	18.3
2	52.6	28.9
3	64.5	29.4
4	78.9	41.7
5	81.1	45.7
6	69.8	51.5
7	83.9	64.7
8	92.2	75.7
Total	76.8	46.4

#### Results:

Student/households were placed in one of six categories reflecting their qualification for free or reduced priced lunches. These were foster children, those living in households receiving welfare or food stamps, who automatically qualify for free lunches, and three categories of income relative to the poverty level--less than 135%, between 135% and 185 percent, and above 185% of poverty. Table 5, presents the percent of student/households falling into each of these groups by strata.

Table 5: Percent of Households with Foster  
Children, Receiving Welfare, Food Stamps, and  
Income Relative to Poverty of Other Households

Percent Welfare Strata	Foster Children	Welfare	Food Stamps Only	Household Income Relative to Poverty		
				below 135%	135%- 185%	above 185%
1t 20%	.0	7.3	.5	13.2	15.6	63.4
20-29%	.0	5.9	5.1	19.8	17.7	51.5
30-39%	.3	7.6	3.4	21.4	21.7	45.6
40-49%	.3	13.4	5.8	26.5	18.6	35.4
50-59%	1.1	13.9	8.6	25.6	18.4	32.3
60-69%	1.7	19.5	8.5	25.1	19.2	26.0
70-79%	1.4	29.1	11.7	25.6	14.5	17.7
80-100%	1.3	33.2	19.6	24.9	11.8	9.1
Total	.6	13.0	5.9	22.3	18.1	40.2

The estimated percent of non-welfare-matched students qualified for free lunches is the sum of the first four columns of Table 5: Foster, Welfare, Food Stamps and those below 135% of the poverty level. The percent qualified for reduced price lunch are those whose household income is between 135% and 185% of the poverty level.

Table 6 presents the percent of students who were not matched with the welfare files who were qualified for free and reduced price lunches for each strata. As can be seen, the percent of non-welfare students qualified for free and reduced price lunches is directly related to the percent of students whose families were identified on the welfare roles. Thus among the 14,626 children attending the eighteen schools with less than 20% of their students on welfare, twenty-one percent of the non-welfare-matched students are qualified for free lunches. By way of contrast, among the 872 students attending the eleven schools where over eighty percent of students received welfare, seventy-nine percent of those not found in the welfare files qualified for free lunches.

Table 6: Percent of Non-Welfare Students  
Qualified for Free and Reduced Price Lunches  
by Strata

Strata	Schools	Non-Welfare			
		Students	Free	Reduced	Other
1t 20%	18	14626	21.0	15.6	63.4
20-29%	30	14384	30.8	17.7	51.5
30-39%	29	12197	32.7	21.7	45.6
40-49%	36	17341	46.0	18.6	35.4
50-59%	30	9633	49.3	18.4	32.3
60-69%	60	15218	54.8	19.2	26.0
70-79%	51	7445	67.8	14.5	17.7
80-100%	11	872	79.1	11.8	9.1
Total	265	91716	41.8	18.1	40.2

Table 7 presents estimates of the percent of all students qualified for free and reduced price lunches. This is calculated by combining the estimates of the percent of non-welfare students who are qualified for free or reduced price lunches, with the results of the computer matches of students and welfare files. The computer match indicates the number of students who are qualified for free lunches. By multiplying the number of students, who were not matched on the welfare files, by the percentages shown in Table 6, estimates of the number of these students who qualified for free or reduced price lunches are generated.

For example, 82.5% of the 4,916 students attending the 11 schools in the 80% to 100% welfare strata received welfare. In addition, seventy-nine percent of the 872 non-welfare matched students attending these schools, or fourteen percent of the total, also qualified for free lunches because they were foster children, received welfare or food stamps or lived in households with incomes below 135% of the poverty level. Thus 96% of the students in this strata were qualified for free lunches. There were also 12% of the non-welfare students attending these schools, or 2% of the total, who qualified for reduced price lunches because they lived in households with incomes between 135% and 185% of the poverty level.

Table 7: Estimates of the Percent of Students Qualified for Free and Reduced Price Lunches by Strata

Percent Welfare Strata	Number of Schools	Percent Welfare Matched	Non-Matched Free	Total Free	Non-Welfare Reduced
1 - 20%	18	15.8	17.7	33.5	13.1
20 - 29%	30	25.4	23.0	48.4	13.2
30 - 39%	29	34.2	21.5	55.7	14.3
40 - 49%	36	45.4	25.1	70.5	10.2
50 - 59%	30	55.1	22.2	77.2	8.3
60 - 69%	60	64.5	19.4	84.0	6.8
70 - 79%	51	74.1	17.5	91.7	3.8
80 - 89%	11	82.5	13.9	96.3	2.1
TOTAL	265	50.4	20.7	71.1	9.0

#### Calculation of Standard Error and Confidence Intervals:

As we have generated sixteen (16) estimates of the proportion of students who are qualified for free and reduced price meals we have calculated 16 standard errors and confidence intervals. This is done using the equation:

$$\text{Standard Error} = \sqrt{(p * q / n)}$$

Where:

p = the proportion of students qualified for free (or reduced price) lunch

q = the proportion which are not qualified

n = the size of the sample for each strata.

One half of the 95% confidence interval is obtained by multiplying the standard error by 1.96. The results are given in the Table 8. For the first strata, the proportion of students qualified for free lunches is 21 percent with a 95% confidence

interval of  $\pm 5.6\%$ . This means that if this research were replicated 100 times, 95-out-of-100 times the estimate of the percent of non-welfare students in the first strata qualified for free lunch would be between 15.4% and 28.6%.

Table 8: Standard Errors and Confidence Intervals by Strata

Welfare Strata	Estimated Free	Standard Error	Half of Conf Int	Estimated Reduced	Standard Error	Half of Conf Int	Sample Size
-20	21.0	2.8	5.6	15.6	2.5	5.0	205
20 - 29	30.8	3.0	5.9	17.7	2.5	4.9	237
30 - 39	32.7	2.6	5.1	21.7	2.3	4.5	329
40 - 49	46.0	2.8	5.4	18.6	2.2	4.2	327
50 - 59	49.3	2.6	5.2	18.4	2.0	4.0	359
60 - 69	54.8	2.6	5.2	19.2	2.1	4.1	356
70 - 79	67.8	2.5	4.9	14.5	1.9	3.7	351
80 -100	79.1	2.1	4.1	11.8	1.7	3.3	371

These confidence intervals appear to be relatively large, especially in the case of the lower strata where the 95% confidence interval is above  $\pm 5\%$  percent.

It will be remembered that the study population of this research is only those students who were not matched on the welfare files. When we take this into consideration, and ask the question of the size of the confidence intervals relative to the total enrollments, a somewhat different conclusion is suggested concerning the accuracy of these estimates. For example, in the highest strata 83% of students were excluded from the study because they were matched on the public assistance files. This research indicates that 79% of the non-welfare students in this strata, or 14% of the total, are qualified for free lunches. Similarly, the confidence interval is  $\pm 4.1\%$  of eighteen percent. Thus the confidence interval for the highest strata is less than 1% of the total students in these schools.

We have repeated this calculation for all strata. The results are given in Table 9. As expected, the adjustments of confidence intervals are directly related to the proportion of all students covered by the study. The reduction in the size of the confidence interval is greatest among those strata where there were relatively few students whose families were not receiving public assistance.

Table 9: Adjusted Confidence Intervals

% Welfare Strata	Percent Welfare Matched	Percent Not Matched on Welfare	One-half of Adjusted Confidence Intervals	
			Free	Reduced
-20	15.8	84.2	4.7	4.2
20 - 29	25.4	74.6	4.4	3.6
30 - 39	34.2	65.8	3.3	2.9
40 - 49	45.4	54.6	3.0	2.3
50 - 59	55.1	44.9	2.3	1.8
60 - 69	64.5	35.5	1.8	1.5
70 - 79	74.1	25.9	1.3	1.0
80-100	82.5	17.5	0.7	0.6

NUMBER	SCHOOL NAME	TOTAL STUDENTS	% WELFARE MATCHED	ESTIMATED FREE	ESTIMATED REDUCED	TOTAL % LOW INC.
101	BARTRAM, JOHN HIGH SCHOOL	1800	42.8	26.3	10.6	79.8
102	WEST PHILADELPHIA HIGH SC	1561	49.3	23.4	9.4	82.1
108	UNIVERSITY CITY HIGH SCHO	1852	53.6	22.9	8.5	85.0
110	SAYRE, WILLIAM L. MIDDLE	1093	57.2	21.1	7.9	86.2
111	SHAW, ANNA H. MIDDLE	742	62.3	20.7	7.2	90.2
112	SULZBERGER, MAYER MIDDLE	900	67.2	18.0	6.3	91.5
113	TILDEN MIDDLE SCHOOL	851	64.3	19.6	6.9	90.7
115	PEPPER, GEORGE MIDDLE SCH	845	49.5	23.3	9.4	82.1
116	TURNER, JOHN P. MIDDLE SC	1023	50.2	24.5	9.1	83.9
120	BARRY, COMM. JOHN SCHOOL	705	65.0	19.2	6.7	90.9
121	BELMONT SCHOOL	407	74.7	17.2	3.7	95.5
123	BRYANT, WILLIAM C. SCHOOL	644	59.2	20.1	7.5	86.8
125	CATHARINE, JOSEPH SCHOOL	491	62.3	20.6	7.2	90.2
126	COMEGYS, BENJAMIN B. SCHO	608	68.4	17.3	6.1	91.8
127	DREW, CHARLES R. SCHOOL	571	61.8	20.9	7.3	90.1
129	HAMILTON, ANDREW SCHOOL	831	44.3	25.6	10.4	80.3
130	HARRINGTON, AVERY D. SCHO	597	64.8	19.3	6.8	90.9
131	HARRITY, WILLIAM F. SCHO	480	55.4	22.0	8.2	85.6
133	HUEY, SAMUEL B. SCHOOL	808	65.3	19.0	6.7	91.0
134	LEA, HENRY C.	974	60.6	21.6	7.6	89.8
135	LONGSTRETH, WILLIAM C. SC	754	65.0	19.2	6.7	90.9
136	MC MICHAEL, MORTON SCHOOL	676	70.9	19.8	4.2	94.9
137	MITCHELL, S. WEIR SCHOOL	740	64.9	19.3	6.7	90.9
138	MORTON, THOMAS G. SCHOOL	508	64.8	19.3	6.8	90.8
139	POWEL, SAMUEL SCHOOL	233	24.9	23.1	13.3	61.3
140	PATTERSON, JOHN M. SCHOOL	650	53.7	22.8	8.5	85.0
141	RHOADS SCHOOL	613	72.6	18.6	4.0	95.2
142	WASHINGTON, MARTHA SCHOOL	625	75.5	16.6	3.6	95.7
143	WILSON, ALEXANDER SCHOOL	227	66.5	18.3	6.4	91.3
144	PENROSE SCHOOL	440	45.7	25.0	10.1	80.8
145	MILLER, E. SPENCER	195	60.0	21.9	7.7	89.6
146	ANDERSON, ADD B. SCHOOL	512	48.6	23.6	9.6	81.8
147	LOCKE, ALAIN SCHOOL	403	79.2	14.1	3.0	96.3
149	BLANKENBURG, RUDOLPH SCHO	368	64.4	19.5	6.8	90.7
150	BARTRAM, JOHN-FRESHMAN CE	243	43.6	26.0	10.5	80.1
153	LEIDY SCHOOL	377	70.6	20.0	4.3	94.8

NUMBER	SCHOOL NAME	TOTAL STUDENTS	% WELFARE MATCHED	ESTIMATED FREE	ESTIMATED REDUCED	TOTAL % LOW INC
157	BARTRAM, JOHN-MOTIVATION	264	24.6	23.2	13.4	61.2
158	MIDDLE YEARS ALTERNATIVE (	268	35.1	21.2	14.1	70.4
199	CATTO-BARTRAM, JOHN HIGH	272	39.3	19.8	13.2	72.4
200	SOUTH PHILADELPHIA HIGH S	1216	50.2	24.6	9.2	83.9
201	FRANKLIN BENJAMIN HIGH SC	1420	61.2	21.3	7.5	89.9
202	CREATIVE AND PERFORMING A	605	21.8	24.1	13.9	59.8
209	BOK, EDWARD HIGH SCHOOL	929	48.1	23.9	9.6	81.7
210	AUDENRIED, CHARLES HIGH S	655	63.1	20.2	7.1	90.4
211	BARRATT, NORRIS S MIDDLE	950	70.9	19.7	4.2	94.9
212	VARE, EDWIN H. MIDDLE SCH	967	63.8	19.8	7.0	90.6
213	VAUX, ROBERTS MIDDLE	915	78.1	14.8	3.2	96.1
214	MASTERMAN, JULIA R. SR. H	288	11.5	18.6	13.8	43.9
215	THOMAS, GEORGE C. MIDDLE	541	53.2	23.1	8.6	84.9
216	FURNESS, HORACE HIGH SCHO	995	45.8	24.9	10.1	80.8
219	FELL, D. NEWLIN SCHOOL	439	50.8	24.3	9.0	84.1
220	ALCORN, JAMES SCHOOL	576	86.3	10.8	1.6	98.7
221	BACHE-MARTIN SCHOOL	731	43.2	26.1	10.6	79.9
222	MASTERMAN, JULIA R.	781	14.1	18.0	13.4	45.5
224	BREGY, F. AMEDEE SCHOOL	543	61.0	21.4	7.5	89.9
226	CHILDS, GEORGE W. SCHOOL	535	77.4	15.3	3.3	96.0
229	FRANKLIN LEARNING CENTER	892	38.7	20.1	13.3	72.1
230	DURHAM, THOMAS CHILD DEV.	226	39.4	19.8	13.2	72.4
231	BOONE, DANIEL SCHOOL	174	68.4	17.3	6.1	91.8
232	GIRARD, STEPHEN SCHOOL	1078	45.9	24.9	10.1	80.9
234	MC CALL, GEN. GEORGE A. S	593	25.6	22.9	13.2	61.7
237	MC DANIEL, DELAPLAINE SCH	630	71.6	19.3	4.1	95.0
238	MEREDITH, WILLIAM M. SCHO	526	26.6	22.6	13.0	62.2
239	MORRIS, ROBERT SCHOOL	530	77.4	15.4	3.3	96.0
240	PEIRCE, WILLIAM S. SCHOOL	646	70.9	19.7	4.2	94.9
242	REYNOLDS, GEN. JOHN F. SC	456	80.0	15.8	2.4	98.2
243	PALUMBO, FRANK SCHOOL	285	84.2	12.5	1.9	98.6
244	SMITH, WALTER G. SCHOOL	621	71.5	19.3	4.1	95.0
245	STANTON, EDWIN M. SCHOOL	237	76.4	16.0	3.4	95.8
247	GREENFIELD, ALBERT M. SCH	772	21.2	24.3	14.0	59.5
248	ARTHUR, CHESTER A. SCHOOL	310	75.2	16.8	3.6	95.6

NUMBER	SCHOOL NAME	TOTAL REVENUE	% RELEASE	ESTIMATED SALES	ESTIMATED EXPENSES	TOTAL % LOWING
249	WARING, LAURA W. SCHOOL	276	79.3	14.0	3.0	96.4
251	JACKSON, ANDREW SCHOOL	308	63.0	20.3	7.1	90.4
252	JENKS, ABRAM SCHOOL	208	42.3	26.6	10.7	79.6
254	KEY, FRANCIS SCOTT SCHOOL	460	67.6	17.8	6.2	91.6
258	KIRKBRIDE, ELIZA B. SCHOOL	555	66.8	18.2	6.4	91.4
259	NEBINGER, GEORGE W. SCHOOL	298	65.4	18.9	6.6	91.0
263	SHARSWOOD, GEORGE SCHOOL	378	46.3	24.7	10.0	81.0
264	SOUTHWARK SCHOOL	794	68.5	17.3	6.0	91.8
269	TAGGART, JOHN H. SCHOOL	561	57.9	20.7	7.7	86.4
272	VARE, ABIGAIL SCHOOL	566	68.6	17.2	6.0	91.8
273	WASHINGTON, GEORGE SCHOOL	369	73.2	18.2	3.9	95.3
401	GRATZ, SIMON HIGH SCHOOL	1813	59.8	19.8	7.4	87.0
402	OVERBROOK HIGH SCHOOL	2412	41.0	27.2	11.0	79.1
403	CARVER HIGH SCHOOL	661	17.4	17.3	12.9	47.6
406	DOBBINS, MURRELL HIGH SCH	1807	46.2	24.8	10.0	81.0
410	BEEBER, DIMNER MIDDLE	1165	40.6	27.3	11.0	79.0
411	FITZSIMONS, THOMAS MIDDLE	877	70.2	20.2	4.3	94.7
412	GILLESPIE, ELIZABETH MIDDLE	1145	65.1	19.1	6.7	90.9
413	SHOEMAKER, WILLIAM H. MID	784	59.1	20.2	7.5	86.8
414	STRAWBERRY MANSION HIGH S	1767	66.6	18.3	6.4	91.3
415	RHODES, E. WASHINGTON MID	1087	63.3	20.1	7.1	90.5
421	DAROFF, SAMUEL SCHOOL	734	65.1	19.1	6.7	90.9
422	BLAINE, JAMES G. SCHOOL	470	70.9	19.8	4.2	94.9
424	CASSIDY, LEWIS C. SCHOOL	669	45.3	25.2	10.2	80.7
426	CLEVELAND, GROVER SCHOOL	738	64.9	19.2	6.7	90.9
427	DICK, WILLIAM SCHOOL	312	81.4	14.7	2.2	98.3
428	GOMPERS, SAMUEL SCHOOL	416	31.7	22.3	14.8	68.9
429	BLUFORD, G. S.	847	58.4	20.5	7.6	86.6
430	HESTON, EDWARD SCHOOL	596	69.3	16.8	5.9	92.0
431	KENDERTON SCHOOL	462	68.4	17.3	6.1	91.8
432	LAMBERTON, ROBERT E. SCH	1156	22.9	23.7	13.7	60.3
434	MANN, WILLIAM B. SCHOOL	553	48.5	23.7	9.6	81.8
437	PHILADELPHIA REGIONAL HS	220	37.3	20.5	13.6	71.4
438	PEIRCE, THOMAS M. SCHOOL	510	65.9	18.7	6.6	91.1
439	PRATT, ANNA B. SCHOOL	407	77.6	15.2	3.2	96.1



NUMBER	SCHOOL NAME	TOTAL STUDENTS	% WELFARE MATCHED	ESTIMATED FREE	ESTIMATED REDUCED	TOTAL % LOW INC
440	STANTON, M. HALL SCHOOL	647	76.8	15.7	3.4	95.9
442	WALTON, RUDOLPH S. SCHOOL	368	77.2	15.5	3.3	96.0
443	WHITTIER, JOHN G. SCHOOL	603	67.7	17.7	6.2	91.6
444	ALLEN, DR. ETHEL SCHOOL	499	70.3	20.1	4.3	94.8
445	HILL, LESLIE P. SCHOOL	509	69.7	16.6	5.8	92.1
446	DUCKREY, TANNER SCHOOL	568	75.4	16.7	3.6	95.6
447	WRIGHT, RICHARD R. SCHOOL	366	74.9	17.0	3.7	95.6
448	OVERBROOK EDUCATIONAL CEN	326	17.8	17.2	12.8	47.9
451	DOUGLASS, FREDERICK SCHOO	603	76.6	15.9	3.4	95.9
453	GIDEON, EDWARD SCHOOL	375	75.7	16.5	3.5	95.7
456	KELLEY, WILLIAM D. SCHOOL	420	75.0	17.0	3.6	95.6
457	MEADE, GEN. GEORGE C. SCH	624	82.4	13.9	2.1	98.4
501	KENSINGTON HIGH SCHOOL	994	60.5	21.7	7.6	89.7
502	EDISON, THOMAS A. HIGH SC	2244	61.8	21.0	7.3	90.1
504	PENN HIGH, WILLIAM	1695	62.7	20.5	7.2	90.3
506	MASTBAUM, JULES E. HIGH S	1393	45.9	24.9	10.1	80.9
507	PARKWAY S G LASALLE UNIV.	173	27.2	22.4	12.9	62.5
508	PARKWAY SCHOOL -CENTER CI	226	34.1	21.6	14.3	70.0
509	PARKWAY SCHOOL - GAMMA	201	30.3	22.8	15.1	68.3
510	JONES, JOHN PAUL MIDDLE S	1188	67.2	18.0	6.3	91.5
511	PENN TREATY MIDDLE SCHOOL	879	75.0	17.0	3.6	95.6
512	STETSON, JOHN B. MIDDLE S	992	70.3	20.2	4.3	94.7
513	WANAMAKER, JOHN MIDDLE SC	691	75.1	16.9	3.6	95.6
514	STODDART-FLEISHER MID. SC	488	73.8	17.8	3.8	95.4
515	BODINE, WILLIAM W. H.S.	487	25.5	23.0	13.2	61.6
517	JULIA DE BURGOS-BILINGUAL	1070	74.8	17.1	3.7	95.5
520	ADAIRE, ALEXANDER SCHOOL	634	52.5	23.4	8.7	84.7
521	BROWN, HENRY A. SCHOOL	410	74.9	17.0	3.7	95.6
522	CLYMER, GEORGE SCHOOL	689	71.8	19.1	4.1	95.0
523	CONWELL, RUSSELL MIDDLE S	889	38.9	20.0	13.3	72.2
524	DOUGLAS, STEPHEN A. SCHOO	230	64.3	19.5	6.8	90.7
525	DUNBAR, PAUL L. SCHOOL	322	62.1	20.8	7.3	90.2
526	ELKIN, LEWIS SCHOOL	908	77.5	15.2	3.3	96.0
527	ELVERSON, JAMES MIDDLE SC	616	74.2	17.5	3.8	95.4
528	FAIRHILL SCHOOL	539	75.7	16.5	3.5	95.7

NUMBER	SCHOOL NAME	TOTAL STUDENTS	% WELFARE MATCHED	ESTIMATED FREE	ESTIMATED REDUCED	TOTAL % LOWING
529	FERGUSON, JOSEPH C. SCHOO	542	82.3	14.0	2.1	98.4
530	HACKETT, HORATIO B. SCHOO	541	64.9	19.2	6.7	90.9
531	HARRISON, WILLIAM H. SCHOO	391	83.6	12.9	1.9	98.5
532	HARTMANFT, JOHN F. SCHOO	663	81.3	14.8	2.2	98.3
533	HUNTER, WILLIAM H. SCHOO	334	75.7	16.4	3.5	95.7
534	LUDLOW, JAMES R. SCHOO	387	80.1	15.7	2.3	98.2
535	MC KINLEY, WILLIAM SCHOO	408	74.8	17.1	3.7	95.5
537	MOFFET, JOHN SCHOO	490	72.2	18.8	4.0	95.1
538	ALLEGHENY SCHOO	75	70.7	19.9	4.3	94.8
539	POTTER-THOMAS SCHOO	738	75.6	16.5	3.5	95.7
540	RICHMOND SCHOO	516	51.7	23.8	8.9	84.4
541	SHEPPARD, ISAAC SCHOO	439	82.0	14.2	2.1	98.4
542	WELSH, JOHN SCHOO	632	76.9	15.7	3.4	95.9
543	AMY AT JAMES MARTIN	331	38.1	20.3	13.4	71.8
544	WILLARD, FRANCES E. SCHOO	541	74.1	17.5	3.8	95.4
545	CARROLL, CHARLES SCHOO	314	51.3	24.0	9.0	84.3
547	CRAMP, WILLIAM SCHOO	869	71.5	19.4	4.1	95.0
548	KEARNY, GEN PHILIP SCHOO	293	79.2	14.1	3.0	96.3
549	CAYUGA SCHOO	417	64.5	19.5	6.8	90.8
553	SHERIDAN, PHILIP H. SCHOO	643	63.5	20.0	7.0	90.5
556	SPRING GARDEN SCHOO	300	83.7	12.9	1.9	98.5
559	WEBSTER, JOHN H. SCHOO	604	57.9	20.7	7.7	86.4
601	CENTRAL HIGH SCHOO	2251	11.5	18.6	13.8	43.9
602	GERMANTOWN HIGH SCHOO	1586	47.7	24.1	9.7	81.5
603	ROXBOROUGH HIGH SCHOO	1253	30.0	22.9	15.2	68.1
604	SAUL, WALTER B. HIGH SCHOO	626	18.5	17.1	12.7	48.3
605	GIRLS, HIGH SCHOO FOR	1321	18.8	17.0	12.7	48.5
606	KING, MARTIN LUTHER HIGH	2396	36.9	20.6	13.7	71.2
610	LEEDS, MORRIS E. MIDDLE S	902	33.5	21.8	14.4	69.7
611	ROOSEVELT, THEODORE MIDDLE	725	52.7	23.3	8.7	84.7
615	PICKETT, CLARENCE E MIDDLE	995	60.5	21.6	7.6	89.7
616	LEWIS, ADA H. MIDDLE SCHOO	889	49.5	23.3	9.4	82.1
620	DAY, ANNA B. SCHOO	476	52.3	23.5	8.8	84.6
621	EDMONDS, FRANKLIN S. SCHOO	726	41.2	27.1	10.9	79.2
622	EMLIN, ELEANOR C. SCHOO	702	52.0	23.7	8.8	84.5

NUMBER	SCHOOL NAME	TOTAL STUDENTS	% WELFARE MATCHED	ESTIMATED FREE	ESTIMATED REDUCED	TOTAL % LOW INC
623	FITLER ACADEMICS PLUS	475	32.2	22.2	14.7	69.1
624	FULTON, ROBERT SCHOOL	378	66.4	18.4	6.5	91.3
625	HENRY, CHARLES W. SCHOOL	680	19.0	17.0	12.6	48.6
626	HOUSTON, HENRY E. SCHOOL	795	27.5	22.3	12.8	62.7
627	JENKS, JOHN S. SCHOOL	552	14.7	17.9	13.3	45.9
628	KINSEY, JOHN L. SCHOOL	506	61.9	20.9	7.3	90.1
629	LEVERING, WILLIAM SCHOOL	506	42.1	26.7	10.8	79.5
630	LOGAN SCHOOL	509	64.8	19.3	6.8	90.9
631	MC CLOSKEY, JOHN F. SCHOO	335	33.7	21.7	14.4	69.8
632	MIFFLIN, THOMAS SCHOOL	395	71.4	19.4	4.2	94.9
633	PASTORIUS, FRANCIS P. SCH	702	62.0	20.8	7.3	90.1
634	PENNEL, JOSEPH SCHOOL	514	56.4	21.5	8.0	85.9
635	PENNYPACKER, SAMUEL SCHOOL	615	47.2	24.3	9.8	81.3
638	SHAMMONT SCHOOL	731	17.5	17.3	12.9	47.7
639	STEEL, EDWARD SCHOOL	773	69.1	16.9	5.9	92.0
640	WIDENER MEMORIAL SCHOOL	278	46.4	24.7	10.0	81.0
641	COOK-WISSAHICKON SCHOOL	436	57.6	20.9	7.8	86.3
643	WISTER, JOHN SCHOOL	483	69.8	16.6	5.8	92.1
644	LINGELBACH, ANNA L. SCHOO	359	42.3	26.5	10.7	79.6
645	DOBSON, JAMES SCHOOL	313	51.4	23.9	8.9	84.3
646	HILL, J.E. / SAMPSON FREED	232	30.2	22.8	15.2	68.2
647	KELLY, JOHN B. SCHOOL	884	65.4	19.0	6.6	91.0
648	AMY NORTHWEST	230	31.3	22.5	14.9	68.7
654	GERMANTOWN-LANKENAU	447	13.6	18.1	13.5	45.2
701	FRANKFORD HIGH SCHOOL	1662	32.6	22.1	14.6	69.3
702	OLNEY HIGH SCHOOL	2469	47.9	24.0	9.7	81.6
710	COOKE, JAY MIDDLE SCHOOL	1112	60.0	21.9	7.7	89.6
711	HARDING, WARREN G. MIDDLE S	999	48.5	23.7	9.6	81.8
712	FELS, SAMUEL SR. HIGH	1256	24.7	23.2	13.3	61.2
713	WAGNER, GEN. LOUIS MIDDLE	971	45.9	24.9	10.1	80.9
720	BARTON, CLARA SCHOOL	735	59.6	19.9	7.4	86.9
721	BIRNEY, GEN. DAVID B. SCH	1074	66.7	18.3	6.4	91.3
722	CARNELL, LAURA H. SCHOOL	982	29.7	21.6	12.5	63.8
724	CREIGHTON, THOMAS SCHOOL	762	39.5	19.8	13.1	72.4
725	EDMUNDS, HENRY R. SCHOOL	760	29.6	21.7	12.5	63.8

NUMBER	SCHOOL NAME	TOTAL STUDENTS	% WELFARE MATCHED	ESTIMATED FREE	ESTIMATED REDUCED	TOTAL % LOW INC
726	ELLWOOD SCHOOL	578	30.8	22.6	15.0	68.5
727	FINLETTER, THOMAS K. SCHO	803	31.9	22.3	14.8	69.0
728	FRANKLIN, BENJAMIN SCHOOL	553	24.2	23.3	13.4	61.0
729	STEARNE, ALLEN M. SCHOOL	447	61.1	21.3	7.5	89.9
730	HOPKINSON, FRANCIS SCHOOL	774	50.0	24.7	9.2	83.8
731	FELTONVILLE SCHOOL	525	58.9	20.3	7.6	86.7
732	HOME, JULIA WARD SCHOOL	436	59.2	20.1	7.5	86.8
733	LAWTON, HENRY W. SCHOOL	497	23.3	23.6	13.6	60.5
735	LOWELL, JAMES R. SCHOOL	839	41.6	26.9	10.9	79.3
736	MARSHALL, JOHN SCHOOL	277	60.6	21.6	7.6	89.8
738	MC CLURE, ALEXANDER K. SC	678	74.6	17.2	3.7	95.5
739	MORRISON, ANDREW J. SCHOO	738	42.3	26.6	10.7	79.6
740	OLNEY ELEMENTARY SCHOOL	644	41.5	26.9	10.9	79.3
742	SMEDLEY, FRANKLIN SCHOOL	475	67.6	17.8	6.2	91.6
743	SULLIVAN, JAMES J. SCHOOL	494	47.4	24.2	9.8	81.4
744	TAYLOR, BAYARD SCHOOL	593	72.0	19.0	4.1	95.1
746	ZIEGLER, WILLIAM H. SCHOO	230	22.2	24.0	13.8	59.9
747	BRIDESBURG SCHOOL	320	41.6	26.9	10.9	79.3
749	PRINCE HALL	623	47.8	24.0	9.7	81.6
750	CENTRAL EAST MIDDLE	713	53.4	23.0	8.6	85.0
751	BETHUNE, MARY MC LEOD SCH	736	73.5	18.0	3.8	95.3
753	ROWEN, WILLIAM SCHOOL	578	55.2	22.1	8.2	85.5
773	CLEMENTE, ROBERTO MIDDLE S	1072	67.4	17.8	6.3	91.5
801	LINCOLN, ABRAHAM HIGH SCHO	1994	26.3	22.7	13.1	62.1
802	NORTHEAST HIGH SCHOOL	2717	17.9	17.2	12.8	48.0
803	WASHINGTON, GEORGE HIGH S	2984	16.6	17.5	13.0	47.1
812	WILSON, WOODROW MIDDLE	1204	21.8	24.1	13.9	59.8
814	MEEHAN, AUSTIN MIDDLE SCH	954	33.9	21.6	14.4	69.9
815	RUSH, BENJAMIN MIDDLE SCH	1100	30.8	22.6	15.0	68.5
816	BALDI, C. C. A. MIDDLE SC	1177	18.4	17.1	12.7	48.3
818	HANCOCK, JOHN SCHOOL	462	21.6	24.1	13.9	59.7
820	ALLEN, ETHAN SCHOOL	456	33.1	21.9	14.5	69.5
821	BROWN, JOSEPH H. SCHOOL	384	35.7	21.0	14.0	70.7
823	CROSSAN, KENNEDY C. SCHOO	218	25.2	23.0	13.3	61.5
824	DISSTON, HAMILTON SCHOOL	571	36.1	20.9	13.9	70.9

NUMBER	SCHOOL NAME	TOTAL STUDENTS	% WELFARE MATCHED	ESTIMATED FREE	ESTIMATED REDUCED	TOTAL % LOWING
825	FORREST, EDWIN SCHOOL	463	35.0	21.3	14.1	70.4
826	FOX CHASE SCHOOL	368	26.6	22.6	13.0	62.2
827	HOLME, THOMAS SCHOOL	497	57.1	21.1	7.9	86.2
830	MAYFAIR SCHOOL	434	25.8	22.9	13.1	61.8
831	MOORE, J. HAMPTON SCHOOL	608	21.1	24.3	14.0	59.4
832	LA BRUM GEN J HARRY MIDDLE	368	29.9	21.6	12.4	63.9
833	SHALLCROSS DAY SCHOOL	146	40.4	27.4	11.1	78.9
834	SOLIS-COHEN, SOLOMON SCHOOL	600	30.5	22.7	15.1	68.3
835	SPRUANCE, GILBERT SCHOOL	827	26.0	22.8	13.1	61.9
836	RHAWNURST SCHOOL	365	28.5	22.0	12.7	63.2
837	COMLY, WATSON SCHOOL	394	10.4	18.8	14.0	43.2
838	FARRELL, LOUIS H. SCHOOL	763	28.8	21.9	12.6	63.4
839	FITZPATRICK, ALOYSIUS L.	445	31.0	22.6	15.0	68.6
840	FRANK, ANNE SCHOOL	697	18.8	17.0	12.7	48.5
841	POLLOCK, ROBERT B. SCHOOL	416	25.7	22.9	13.2	61.8
842	DECATUR, STEPHEN SCHOOL	635	29.6	21.7	12.5	63.8
843	GREENBERG, JOSEPH SCHOOL	552	5.8	19.8	14.7	40.3
844	LOESCHE, WILLIAM H. SCHOOL	744	25.0	23.1	13.3	61.4
854	PENNYPACK ANNEX SCHOOL	193	5.2	19.9	14.8	39.9



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF EDUCATION  
333 MARKET STREET  
HARRISBURG, PA 17126-0333  
[www.pde.state.pa.us](http://www.pde.state.pa.us)

July 8, 2005

Mr. Wayne Grasela  
Division of Food Services  
School District of Philadelphia  
440 North Broad Street  
Philadelphia, PA 19146

Dear Wayne:

The United States Department of Agriculture (USDA) has approved the School District of Philadelphia's (SDOP) continued use of 1994 free and reduced price meal claiming percentages for schools operating under the Paperwork Reduction Pilot Project. The USDA has advised us that the 2005-06 School Year is likely the last year the 1994 claiming percentages can be used to claim federal and state meal reimbursements.

In the next few months, the USDA will engage SDOP and Pennsylvania Department of Education (PDE) staff in discussions regarding options to transition SDOP into a current and acceptable set of data for use in claiming federal and state funds.

Please call me with any questions or comments at (717) 783-6556.

Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Pat Birkenshaw".

Patricia Birkenshaw  
State Director  
Child Nutrition Programs  
Division of Food and Nutrition  
Bureau of Budget and Fiscal Management

cc: Vonda Fekete  
Sandy Souder



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Patricia Birkenshaw  
State Director  
Child Nutrition Programs  
Division of Food and Nutrition  
Bureau of Budget and Fiscal Management

cc: Vonda Fekete  
Sandy Souder

**Wayne Grasela**

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**From:** Birkenshaw, Patricia [mailto:pbirkensha@state.pa.us]  
**Sent:** Thursday, March 22, 2007 4:02 PM  
**To:** wgrasela@phila.k12.pa.us  
**Cc:** kjames@phila.k12.pa.us  
**Subject:** Continuance of 1994 Claiming Percentages

Dear Wayne,

As previously discussed, the Philadelphia School District's request for an extension to continue utilizing the 1994 claiming percentages during school year 2006-2007 has been granted. (The 1994 claiming percentages are set forth in the "Socio-Economic Study of Students Attending Philadelphia Public Schools" report dated November 10, 1994.) The District may continue to submit its claiming percentages based on the 1994 study until such time as the new socio-economic study is completed or June 30, 2007, whichever is sooner. This extension should provide the school district with ample time to complete the new socio-economic study.

Patricia Birkenshaw, Chief  
Division of Food and Nutrition  
Bureau of Budget and Fiscal Management  
Pennsylvania Department of Education  
pbirkensha@state.pa.us  
(717) 783-6556

3/22/2007